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The Hon. Rob Stokes MP
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SUBMISSION TO INLAND RAIL NARROMINE TO NARRABRI EIS.

I OBJECT TO THE PROJECT.

INTRODUCTION:

I am an impacted landholder in the study area the Inland Rail Narromine to Narrabri Inland Rail Greenfield Project. I am a long-standing resident of the Narromine community of over 35 years. My family has been on the land for over 175 years. I am passionate about our community and its future.

Merebone is a registered on-title conservation area adjoining a neighbouring conservation property. Both conservation areas adjoin the Webbs Stock Reserve providing an approximate total of 130 hectares of wildlife corridor.

I submit that the N2N EIS is not in the public interest, impacts are unacceptable and the project should not be approved.

My submission addresses issues associated with Route Planning, Selection Processes, Flooding, Consultation, Air Quality and Engagement on Route Alignment.

CHAPTER A4 – CONSULTATION:

The Narromine to Burroway section was always placed West of Narromine in a well-researched, much shorter, less impactful alignment. Study of this alignment was undertaken in 2009/2010 and supported in the 2015 Inland Rail Implementation Group Report. I have been told many times that this change was due to pressure from Western landholders. Most landholders were only made aware a new eastern alignment had become the route at a meeting on the 14th December 2017.

Consultation for the East Narromine Eumungerie Rd Option only commenced in March 2017 when landholders received a fact sheet in a letter box drop. Significant problems immediately arose when landholders tried to contact the 1800 number listed. Calls to this number were answered by a machine and no follow up occurred.

After leaving several messages I decided to contact ARTC head office to find out about the project. They were helpful and committed to locating their field staff. They then advised me they were having difficulty contacting staff. They then told me they would escalate my request to a National level manager as State level haven't actioned or acknowledged their emails (24th April 2017). It took some weeks to resolve the issue. My experiences with ARTC are nothing new to many impacted landholders and is as follows:

In March 2017 ARTC undertook a letter box drop of the attached N2N Project factsheet. This informed community that alternative study areas were to be looked at. It is important to note, ARTC's 'factsheet' did not include any area South of Narromine. This area was marked only as existing track upgrade of the Parkes to Narromine rail line. An interesting point is that ARTC strangely "lost" this fact sheet from their records. Subsequent ARTC staff were completely unaware of the route selection study areas and the areas South of Narromine not being in any formal study area.

My neighbour contacted me one Sunday afternoon in early April 2017, as they had received a surprise visit by two ladies from Inland Rail wanting to interview them and obtain information regarding their property and she wanted some support. Whilst making notes on various pieces of paper, both these ladies stated several times that it was highly unlikely that the alignment would go to the East due to high community impact, the value of rural residential properties and the Western alignment being well studied and supported. I was particularly concerned about the fact their notes were being taken on scraps of paper and asked them what assurances landholders had that our responses would be correctly and concisely entered into their database and not "lost"? Their response was that they would make sure the information went to the right people and that ARTC would be made aware of our concerns. Subsequent discussions with ARTC consultation teams in 2018 have indicated that this did not happen. This meeting was far from ideal as we didn't have the information needed at hand and were totally unprepared. ARTC ticked a box that a consultation had occurred.

Our consultation eventually occurred at Merebone in late April 2017. Again, ARTC consultation staff repeatedly stated that it was unlikely that the alignment would go to the East due to high community impact, the value of rural residential properties and the Western alignment being well studied and supported. At no stage during this meeting did ARTC consultation staff disclose to me that two route selection multi criteria analysis workshops had already been conducted (Oct and Dec 2016) and that a third was planned for 11th May 2017, literally only a few days away. This is very significant. ARTC's staff had withheld vital information from me. Information regarding the MCA reports would have informed me that ARTC were indeed considering an Eastern Alignment. The MCA Dec 2016 report clearly showed ARTC were seriously considering an alignment that would significantly impact the residents of High Park Estate and Macquarie River Road.

ARTC staff did not inform me of any route selection workshops that might be occurring so I could attend to provide local input. I doubt any additional community workshops were conducted between my consultation date and the final MCA workshop on the 11th May. In effect the route selection process was already completed and landholders East of Narromine had no way to actively contribute local knowledge or their concerns to the decision process.

On 11th May 2017 ARTC conducted the final Multi Criteria Analysis (MCA) Workshop. This workshop recommended an Eastern alignment over the Narromine Backwater Cowal linking up to Eumungerie Road. This alignment study area was named the Narromine to Burroway Eumungerie Road Option.

What has also come to light as we search through the MCA documentation and past fact sheets is the ever changing and expanding nature of the study area. It went from no area South of Narromine to a small area (Dec MCA), to a slightly larger area a few kilometres South of Narromine (May MCA) to the eventual study area which includes a large area 10 km South of Narromine covering many thousands of hectares where no MCA data had been collected. The community impacted by this change had no notification that this was occurring. They were not consulted and ARTC maps gave them no indication they may be impacted. On the contrary the maps indicated ARTC were only considering upgrading the existing rail line. These areas were added on to the study area after the final MCA report.

I would also like to bring to your attention further evidence that not only were ARTC withholding information from the impacted community, they were actively using misinformation and deceit.

On August 3rd 2017, during an ARTC Information Session at Soul Food Café Narromine, I approached them to be informed of N2N route selection developments. I was told that the route was definitely west of Narromine following the concept alignment. With reference to ARTC maps, staff showed me where it would go, indicating that landholder agreements already had and currently were being put in place. They categorically stated that the preferred route was to the West and they were no longer considering the Eastern option.

This information correlated with the "Inland Rail - Parkes to Narromine Environmental Impact Statement (EIS)" which made no provision to study any Eastern diversion off the existing Parkes to Narromine rail line plus a substantial upgrade (timber to concrete) of the existing Backwater Cowal rail bridge had just been completed. This feedback was a big relief to me and I shared this information with other concerned landholders. It has personally left me devastated to discover on 14th December 2017 that it was all lies. I believe this was deliberate ploy. Many of the ARTC staff involved with this inept consultation process have moved on and a whole fleet of new faces now deal with this legacy. Sadly, this has not led to consultation being any better, rather it got worse. Landholders questions are now met with comments such as "It was a ministerial decision, it's out of our hands" and "it's historical, part of phase 1 and we're now in phase 2". This circular argument whereby ARTC advised the minister to change the route and then put the onus back on the minister as being the decision maker leaves the community frustrated and alienated and is completely unacceptable.

At a subsequent 2018 'Study Area' meeting ARTC were very pushy to the point of trying to fill the form out for us so we could just sign it. ARTC focussed only on the job they were tasked to do. They paid lip service to concerns and it became obvious to all they were uninterested in addressing any the route selection issues. I did not sign anything. After taking time to go over the document thoroughly, I found this was another example of ARTC hiding the truth and misleading landholders. They were asking landholders to sign a Land Access Agreement which referred to an Annexe document that was not supplied. I asked for these documents to be sent to me and received no response.

Similar consultation behaviour was repeated by ARTC with other landholders. Landholder trust fell to an all-time low resulting in absolute refusal to allow ARTC access to property. NSW Farmers and CWA of NSW began to ask questions of ARTC as they could see this long-awaited regional investment project was failing to deliver the regional benefits whilst causing a lot of negative issues for regional farms and communities.

In the above I have indicated that ARTC expanded the study area. The following extract from a letter sent by Minister McCormack to the Narromine Country Women's Association Branch (Ref: MC19-003647 dated 23rd September 2019) clearly indicates that ARTC and the minister were aware of this expansion. "The Australian Rail Track Corporation (ARTC) has acknowledged that, at the time of expanding the study area south and east of Narromine subsequent to the 11 May 2017 workshop it did not actively engage with landowners in the 'expanded' part of the study area. I was pleased to note that ARTC apologised for the oversight and as a priority in November and December 2017 did meet with those landowners and has continued to engage with them on a regular basis in the period since." What is interesting about his statement is Minister McCormack again advises concerned community members that consultation has taken place when it has not. These landholders did not find out about their exposure to the project until the 14th December 2017 meeting public announcement at the Narromine USMC.

This statement affirms that these landholders were not consulted prior to the MCA decision being made. As such they had no opportunity to have fair hearing and meaningful input into the decision-making process. In addition, ARTC have not made full and frank disclosure that the expansion of the MCA and Options Report study areas resulted in the omission of a significant amount of data necessary to make a fair decision in the route selection. The addition of 4 thousand hectares (10,000 thousand acres) of land after Minister Darren Chester's approval of the route selection change from West Narromine to East Narromine resulted in inaccurate assessment of flood risk and exposure, numbers of households impacted, length of new track required, increased construction costs, increased transit time, all negatively impacting on MCA criteria for technical viability; constructability and scheduling; operations; community and property impacts and safety assessment. This makes a total of approximately 10,000 hectares outside the documented Narromine alternative study area used by ARTC for alignment expansion. With no consultation or MCA data collected on this.

Project **fact** sheets should by nature be considered a reliable and accurate source of information. ARTC's fact sheet also failed to disclose important information regarding ARTC conducting prior MCA workshops and substantial advancement of the route selection process. All this occurred six months prior to the fact sheet being released. The fact sheet misinforms the reader by implying they are only just now starting this work. ARTC's lies and obfuscation have led to a fundamental breakdown in consultation procedures and has left impacted landholders feeling powerless, frustrated and angry enough to take seek legal support at their own expense.

It's important to note community sentiment indicated a review of the route change was needed. In early January 2018 at our local supermarket, after the announcement in Narromine on 14th December 2017, over 1,000 petition signatures were gathered in 7 days asking for the route change to be reviewed. Narromine has a population of approximately 3,500.

I am very concerned that ARTC consider they have no duty to any party. Not to landholders, Government or the taxpayers. The disclaimer below features in the latest MCA and on infrastructure maps provided to landholders.

"ARTC makes no representation or warranty and assumes no duty of care or warranty or offer responsibility **to any party** as to the completeness, accuracy or suitability of the information contained in this GIS map. The GIS map has been prepared from material provided to ARTC by an external source and ARTC has not taken any steps to verify the completeness, accuracy or suitability of that material. ARTC will not be responsible for any loss or damage suffered as a result of any person whatsoever placing reliance upon the information contained within this GIS map."

How is this statement appropriate? It is not in keeping with duty of care. Though it is in keeping with how ARTC conduct themselves. Without thought for any consequence, especially for affected landholders & communities.

The Narromine to Burroway community experience is not unique. Last minute route changes have occurred in many contentious areas along the Inland Rail. It is a recurring theme for ARTC.

There have been instances of lobbying and misconduct relating to Inland Rail. If a council is supportive of Inland Rail, landholders immediately ask, "Why?", generally finding someone has something to gain from giving support to Inland Rail.

Narromine Council's General Manager has a proposal to open a local quarry specifically to supply Inland Rail with a substantial quantity of fill. Whilst a Councillor has a pecuniary interest in another local quarry. I raise the question of their pecuniary interests and respectfully ask if these individuals have followed appropriate procedures to declare them? Community Consultative Committees (CCC) are established to allow the community to hear up to date project information, have input and provide feedback. Currently, these committees are run like a series of lectures and any members questions which do not suit ARTC and the chair are deemed to be "historical" in nature and therefore not relevant to the project. Community membership of the CCC is voluntary. Community members are attending meetings at their own expense and have a right to be heard, not have their time wasted.

Eventually Observers were allowed to ask questions but only if they have submitted those questions before the next meeting. How can an observer know what questions they need to ask until they have heard the presentation? This is a depressing catch-22 designed to stop meaningful discussion. I also note that it took so long for ARTC to acknowledge and develop the protocols to allow observer questions (requested by CCC members very early on) that only one observer question has occurred on the last CCC meeting on the eve of the EIS release. How is this community consultation? ARTC should be encouraging people to attend, to bring their questions and have full and frank discussion with an aim to provide solutions for issues. Instead, they do the opposite and bury the community in protocols and procedures which take over a year to sort out.

My experience with the CCC has been less than satisfactory. On 22nd Jan 2019 I attended the Narromine Community Consultative Committee (CCC) meeting as an observer. I was sitting quietly in the back of the room waiting for the meeting to start when I was approached by the Chair and asked to leave. When I questioned this request and stated that as a concerned member of the community and a directly affected landholder that surely as this was a Community meeting that I should be allowed to stay, the Chair responded, 'This is not about landholders.' He also stated, 'I'm the chair and I have the ultimate say on who can attend'. He proceeded to lecture me on ARTC Community CCC rules. I stated, 'As I am the only community member present and in no way will my behaviour pose any threat of disruption, I should be allowed to stay.' He still insisted that I leave, so I did.

This gave me and those I later related my experience to, a clear indication of just how these meetings would and are run. It is unmistakably not about the community or their concerns. Again, we don't have consultation we have an ARTC promotional forum. I consider the CCC's to be run unjustly, unfairly and with bias. Feedback from CCC's members along the route as far as Brisbane support my statements.

It is also interesting that staff at the coal face of government interaction found their positions untenable. At the 2nd Narromine CCC meeting in March 2019, we were informed that the former Manager of Stakeholder Engagement, NSW Inland Rail was resigning from this position. After the meeting we spoke candidly and the manager told me that she was 'leaving ARTC and she hoped that in her new position that she would be listened to'. I understand why she felt this way as at no stage of any consultation have landholders actually been listened to. It's been 3 long years of struggling to be heard.

CHAPTER B3 – FLOODING:

UNDERESTIMATION AND FAILURE TO DISCLOSE FULL FLOOD EXPOSURE IMPACTS:

The failure to effectively consult with local landholders has resulted in the MCA document and ultimately the Options Report completely underestimating the projects exposure to construction and flood risk. No hydrological studies were carried out by ARTC prior to directing the alignment into the Backwater Cowal south east of Narromine. There is a clear failure to inform the MCA workshops of the existence of the Webb Siding Overflow. This overflow is well known by local landholders and is clearly referenced in local Macquarie River flood studies. The overflow directs substantial flood waters out of the Macquarie River in high flood dispersing it over a large flood plain throughout the Backwater Cowal landscape. Landholders can attest to the depth, velocity, frequency of the flooding issues and the threat to life & livelihood this entails. Local knowledge has been ignored; the 1955 floods saw 2km of the main western railway washed away by the outflow. Locals know the intent was to rebuild this section higher but that never occurred, expediency dictated it was actually rebuild lower than before. ARTC flood model says the existing rail line will hold back a 1 in 100 flood, local knowledge has proof that it will be over topped by 300mm of flood water for over 2km of track. The 2019 Narromine Flood Levy study flags this same issue as well. The main western line will fail and the project will be hit by wall of cascading water and the community will be left to respond to the emergency. If ARTC continue to ignore local knowledge and a damage occurs as a result of lack of ARTC's due diligence and duty of care, they should be held accountable.

The MCA document makes no reference and does not inform the workshop panel of the size and significance of the Backwater Cowal catchment area. This catchment area covers over 300 square kilometres of elevated hills including granite ranges. The Backwater Cowal area is the meeting point

of over a dozen large streams making it a substantial flood zone in its own right. The additional flows from the Macquarie River through Webb Siding make Inland Rails study area a major flood zone and heightens the risk to residents, businesses and township. ARTC's failure to consult appropriately with the impacted landholders and recognise the flooding issues places the Inland Rail project in significant jeopardy from floods which will result in major construction delays, budget over runs, maintenance issues and significant danger to our community.

The MCA Workshop Report states, 'Narromine to Burroway – Eumungerie Road Option. The overall MCA weighted score was 0.55 for this option. They refer to a marginal difference between the two options when assessed against the MCA criteria.' ARTC have made their decision without knowing the facts or listening to landholders, who have many times since, tried to make them aware of them. They continually use the cover of ministerial decision and 'historical phase 1 issues' as not being relevant to their current work load. I strongly believe that once the missing data is entered correctly it will show that the Eastern route is not 'on balance of marginal difference' but will be shown to be much worse than the Western preferred concept alignment. It is also important to note that the original 2010 alignment study made comment that the alignment east of Narromine would be exposed to increased flooding risk in comparison to the western concept alignment. This 2010 report obviously undertook a far more rigorous analysis which flagged the heightened flood risk. ARTC's previous findings were never disclosed or evaluated by the MCA's, option reports or route history documents. More examples of false and misleading information peddled by the managers of Australia's largest regional infrastructure investment. God help us all.

The Eastern Narromine alignment has 3 acute angle turns between Narromine and Coboco Rd Road even though ARTC constantly refer to the need for a straight line. The Western concept alignment is a much shorter and straighter alignment.

ENVIRONMENT:

Page 7 of 47 Options Report ARTC states ARTC "aim to minimise our environmental footprint". How can this be true when ARTC have selected an area that contains not one but four sensitive areas including the Webbs Reserve. Webbs Reserve is ranked as being of very high cultural significance with scar trees and other Aboriginal artefacts. The eastern proposal area contains critically endangered vegetation communities including - 'White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland'; 'Grey Box (*Eucalyptus microcarpa*) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia'; 'Weeping Myall Woodlands' and 'Fuzzy Box Woodland on alluvial Soils of the South Western Slopes, Darling Riverine Plains and Brigalow Belt South Bioregions'. An additional significant feature of the site is a population of White Box trees located on Webb's Reserve; this population represents the western most distribution of this species in Central West NSW. Adjoining Webbs Reserve are two registered conservation properties on High Park Rd that are protecting and restoring 18 hectares of 'Grey Box Grassy Woodlands'.

FINANCIAL ARRANGEMENTS OF THE PROJECT:

The Final MCA Report May 2017 Section 5 Comparative cost estimates lists the Narromine to Burroway eastern alignment costing +17% compared to the concept alignment. As is typical with ARTC documentation no rationale for this figure is provided but analysis of the section text indicates complexities of construction around dealing with high voltage power lines, additional rail over road bridging, higher acquisition costs and compensation costs associated with the land recently rezoned as R5 are components of this figure. Bottom line is a 17% cost increase to route the alignment east. This equates to \$37.1 million extra dollars the Australian tax payer must find for this project section, that’s almost an extra million per km (Fig 1.) The MCA final report lists the eastern alignment as 41km when it is in fact 49km (due to the alignment leaving the existing Parkes to Narromine rail 7km further south than originally planned). This extra track length has not been costed and will likely range between \$40 to \$50 million as well as the additional costs associated with extensive flood culverts. Minimum additional cost is now approaching \$90 million (40%). The 2010 Inland Rail Alignment Study references the installation costs of a single 750 x 900mm box culvert @ \$230,000. Pinedene and Wallaby Rd study area will require kilometres of flood relief culverts. The Narromine to Burroway Eumungerie Rd section of N2N is truly in deep financial trouble.

Fig 1. Australian Government Inland Rail Narromine to Narrabri Corridor
Multi-criteria Assessment

Corridor section	Comparison Against Original Concept Corridor		
	Cost difference	Transit time difference	Overall MCA score
Narromine to Burroway	+ \$37.1 million	+ 0:00:24	+ 0.55
Burroway to Curban	- \$4.4 million	+ 0:01:20	+ 0.43
Curban to Mt Tenandra	+ \$34.6 million	+ 0:09:04	- 0.27
Mt Tenandra to Barradine	0	0	0
Barradine to Narrabri	- \$83.4 million	- 0:07:35	+3.18



INLAND RAIL HIDDEN COSTS:

Narromine is located less than forty kilometres from Dubbo which is a major logistics, manufacturing, health and educational hub for western NSW. Being close to Dubbo has both positive and negatives. It provides easy access to vital services however Narromine retail enterprises struggle to compete with our many vacant shop fronts testimony to this. Narromine needs to attract more people to the town to secure our future.

One of the emerging growth opportunities for our town is the provision of rural life style acreage with close access to Dubbo. Successful rural residential and small acreage development already exist to the east of Narromine with Macquarie View, High Park and Villeneuve Estate all attracting many professional families to our community. Families whose investment and ongoing commitment support schools, trades and retail in our town. Rural lifestyle acreage has emerged as a popular draw to our area and is a unique opportunity for Narromine’s growth as Dubbo city is an easy 25-minute commute from East Narromine. The Narromine to Burroway Eumungerie Rd Inland Rail project significantly impacts this narrow corridor of land located within Narromine Shire.

Affected landholders are also hard hit financially. Property values in or near the East Narromine corridor have suffered significant depreciation. This statement is supported by those that are trying to

sell but cannot. Another example of the hidden cost of Inland Rail which has never been studied or even acknowledged.

This impact severely reduces the desirability of small acreage East and North East of Narromine and will limit future rural residential development within the Narromine Shire. In the ARTC MCA Narromine Council's stated preference is for Western Route option as they had planned sub divisions.

ARTC now state that Narromine Council's planned sub-divisions are no longer going ahead. This statement is misleading as it implies that council came to this discussion on their own volition.

Narromine Council spent many 10's of thousands of ratepayer dollars on identifying and formulating planned subdivisions. Council is not going ahead because of Inland Rail's last minute Eastern route change. Council's decision is a direct response to Inland Rail's proximity to this planned expansion and is detrimental to our community's growth. Additionally, there is another large private sub division NE of Narromine that has had to be cancelled.

TECH REPORT 14 – ECONOMIC:

FINANCIAL RISKS ASSOCIATED WITH THIS PROJECT:

Caveat Emptor – Let Potential Stakeholders Beware.

ARTC have set themselves up to fail with their lack of planning and a consistent refusal to listen to community regarding East Narromine flood impacts. A Base Cost Ratio (BCR) of 1:02 is almost as low as you can go without actually admitting there is no profit to be made. This BCR of 1.02 is prior to realising that the infrastructure scope of works was hugely underestimated.

Inland Rail's budget has already blown out requiring a \$5.5 billion finance injection due to complete underestimation of the base costs. This blowout now makes the BCR negative. Costs will continue to mount as repeated underestimation of flood plains, rail crossings and every other construction requirement are added to the total. All this extra money has to be repaid with interest.

ARTC's unnecessary crossing of the worst flood plain around Narromine will cause maintenance issues resulting in additional cost blowouts and maintenance shutdowns. ARTC will never meet their 24-hr service offering.

Acland Mines (owned by New Hope) now has to return to the Land Court. Income from Acland coal transport is a major contributor to their income revenue with ARTC assuming 19.5mtpa. This is now clearly in jeopardy and the final legal outcome may take years to obtain as community in that region are fighting for their livelihoods and the most precious commodity of all....their WATER. This will have a big impact on revenue returns for Inland rail. Inland Rail's BCR is now negative. The project will never be able to service the loan. Interest will accumulate, maintenance costs will escalate and ARTC as a tax payer owned company will become insolvent. Our community is very concerned.

We are aware that ARTC has completely underestimated the base cost for the N2N project. References in the EIS indicate the following:

EIS Infrastructure Requirements	Infrastructure Length Quoted in EIS	2015 Business Case Assumption	Difference
Bridging	15 kms	3.7 kms	400% blowout
Culverts	11 kms	0.6 kms	2,000% blowout
Road Realignments	Min of 20 kms.	1.8 kms	1,000% blowout

This puts our community at financial risk if the project commences without sufficient financial resources to adequately compensate landholders and provide them with replacement infrastructure and access. Project costs will be transferred to impacted landholders and our regional community. The project may have insufficient financial resources to complete the 306 km alignment resulting in farming businesses and the community impacted and the project left incomplete. Maintenance and operational costs of this greenfield project may also become a liability of the NSW Government and this possibility will need to be evaluated.

Similar issues are evident in ARTC's own documentation covering every section of the Inland Rail project routes. Until ARTC can clearly demonstrate to the community and impacted State governments that they have the financial resources to build and maintain this project it should not proceed.

CHAPTER A6 – ALTERNATIVES AND OPTIONS:

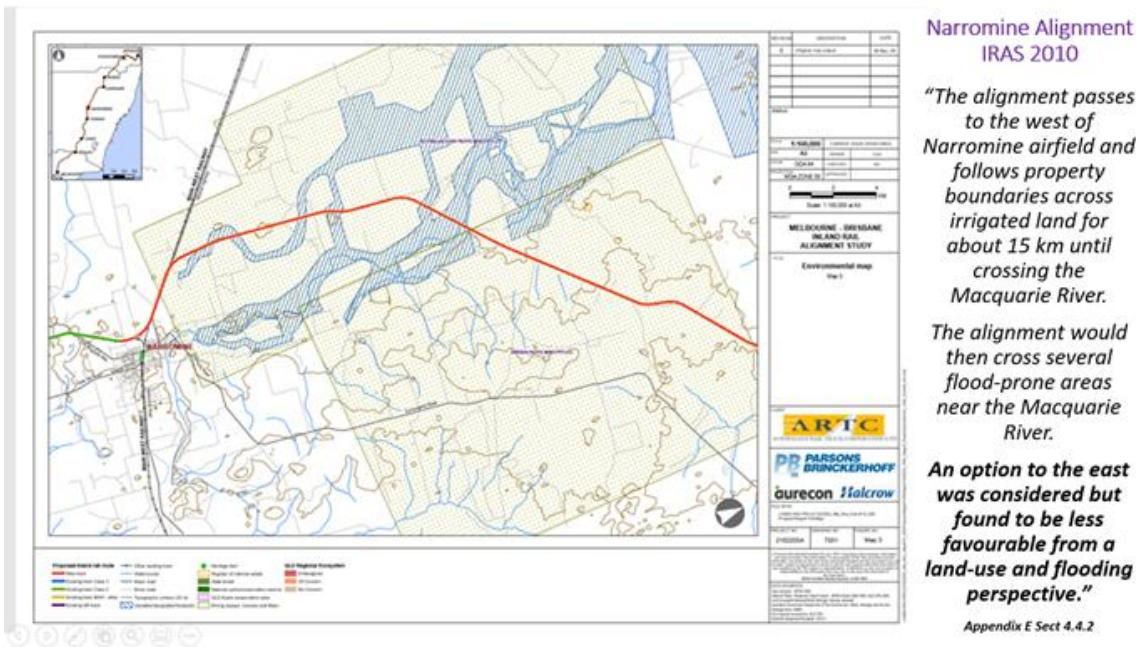
Why is Narromine needlessly being surrounded by rail when one comprehensive Western route was chosen in 2010? It's like some kind of farcical, sick joke at our community's and the taxpayer's expense.

Here's the reality of Narromine Inland Rail in 2021. ARTC have decided to complete a section of the original Western concept alignment – now called the Narromine West Connect in the N2N EIS.



So now ARTC has rail impacting Narromine in the north, east, west, and south. The Narromine West Connect was part of the original concept alignment (see IRAS 2010 map below). If the original concept alignment was constructed the N2N project would be:

- 9km shorter;
- 13km less green field impact;
- 100's of millions of \$ less expensive;
- have less community impact.
- Less risk to rail operations



The N2N EIS data shows the MCA assumptions which moved the alignment east, were baseless. 1 in 100-year flooding length is actually slightly longer to the east – NOT substantially shorter as claimed by ARTC in their flawed MCA.

The Geotech is very similar, but no cut and fill 'win' to be found on the east. All the massive earth embankments (18km long, with some up to 10 meters high and 90 meters wide) will have to be imported from ARTC's preferred burrow pits up to 26km away – no efficiency gains there either!

Once the EIS incorporates community feedback on flooding issues (so far ignored), ARTC will find flood depth and velocity substantially greater in the east. This Eastern area floods so frequently you could become bogged for months. For example, the 'new' eastern alignment has extensively flooded 7 times in the last nine months. The western concept alignment was barely impacted over this same time – why? Because it doesn't have 300 sq km of solid granite range shedding water like a tin roof into it. Seems like IRAS 2010 was right to dismiss the eastern study area. "An option to the east was considered but found to be less favourable from a land-use and flooding perspective." IRAS Appendix E Sect 4.4.2.

CHAPTER B8 – NOISE AND VIBRATION (CONSTRUCTION) and; CHAPTER B9 – NOISE AND VIBRATION (OPERATION):

Expectation for any project which is going to impact community and individuals is that the consultation process should provide clear and consistent guidance on standard issues such as noise, dust vibration, rail crossings, fencing and bio hazards. ARTC to date have not been able to satisfactorily answer any community questions about these issues. It's as if they don't know how they will be addressed. This is puzzling as large infrastructure projects always face these questions immediately on engaging the community and yet they have left affected landholders hanging. We live in a very open environment with typical country outdoor lifestyles and quite a few of us live along a river which will act as a noise tunnel magnifying both the noise and vibration of the Macquarie River crossing point. ARTC need to get their act together and produce standard descriptions of what residents will be provided with to mitigate the entire range of impacts within a specified distance from the rail.

CHAPTER B10 – AIR QUALITY:

I failed to find any Air Quality data in the EIS so I asked Mr Lloyd Stümer to take a look for me. Mr Stümer was the Senior Scientist for the Development of the Initial "Brisbane Air Quality Strategy" to Protect Air Quality for the Brisbane City Council and Residents of Brisbane Airshed. He is eminently qualified to comment on air quality issues. His qualifications are a B AppSc (Physics), Post Grad Diploma in Meteorology, MSc and is a Fellow of Royal Meteorological Society.

Mr Stümer has made the following comments:

"It has taken me a while looking for some sort of reference to the Air Quality data presented in the EIS until I finally realised that there was none. It seems that Air Quality did not even rate a Technical Report to try to explain in any detail the relevant issues. The EIS is of as low a standard as the rest of the Inland Rail information and provides no useful information.

It starts with a promise, ***"This chapter provides the air quality impact assessment of the Narromine to Narrabri project (the proposal). It describes the existing environment, assesses the impacts of construction and operation on air quality, and provides mitigation measures."***

It dismisses the existing environment with respect to air quality. We all know that air quality varies from moment to moment and day to day depending on a lot of issues such as meteorology, rain, local emissions etc.

There are good days (low pollution days) and bad days (high pollution days) such as shown in this link: <https://www.nvi.com.au/story/6533941/air-quality-worse-than-worlds-most-infamously-polluted-cities/>

The link above is included to demonstrate that despite what Inland Rail would have everyone believe, the air quality in the country to which Inland Rail is adding extra emissions (in this case of special concern are fine particulate emissions) can be at time quite poor - in these cases residences near the line and loops may be significantly impacted by the emissions which Inland Rail have refused to consider.

It is these days of high pollution which do occur that must be recognised. Of course, the high pollution days in the link are not due to the rail, but by arbitrarily choosing to ignore the highest 30 percent of pollution events (i.e. choosing for some reason a 70 percentile level), Inland Rail create an artificial unrealistic environment whereby high pollution events are ignored. The analogy would be in choosing a 70 percentile of river heights to try to prove that Inland Rail will have no impact on floods.

ARTC looked at the lowest 70% of occasions. This removes the high levels of pollution as being irrelevant. However, it is the high levels that ARTC should be taking into consideration.

It is a bit bizarre that in order to determine the impacts of the rail in the district, they have only chosen to provide a "qualitative assessment" and not a quantitative modelling assessment i.e. ***{Qualitatively assessing the potential for air quality impacts during operation of freight trains} Quantitatively assessing the potential for air quality impacts associated with idling of locomotives at crossing loops,*** as described in the methodology.

Air quality standards relate to quantities of pollutants and poisons in the atmosphere. A quantitative assessment refers to air quality standards whereas a qualitative assessment does not. Their

determination is useless because it does not have the required quantitative assessment. This qualitative assessment is less accurate and ARTC have no evidence to support their determination. A thorough assessment would have shown small circles of pollution contours similar to a topographical map.

It is bizarre that it seems that the only emissions considered from the Rail are oxides of nitrogen (see Appendix M Figure M9) which would not be thought to be an issue anyway in the rural setting. Fine particulates PM10 and PM2.5 and carcinogenic substances may be of concern to residences close to the rail and loops, but these have been ignored by ARTC.

There is one other thing which may be of significance, but I could not find any reference to it. That is the potential impact of fuel emissions (from the diesel) on some specialist crops.

In summary of the above, Inland Rail have been delinquent in their total methodology and their dismissal without justification of any air quality impacts. Whereas widespread regional airshed problems would not be an issue, Inland Rail has failed to address local impacts which may be an issue. This delinquency is very similar to the cavalier attitude and lies the company has shown in the Brisbane Airshed where it will cause major problems. That offhand attitude is systematic of the whole careless approach by Inland Rail in determining any of its impacts."

CHAPTER A6 – ALTERNATIVES AND OPTIONS:

Political interference and grandstanding must stop. It has been a characteristic of this project that some politicians (including Mark Coulton who has never met with concerned Narramine landholders) have promoted community division and disparaged concerned citizens by labelling them as NIMBY (Not In My Back Yard), 'minority groups' and 'isolated pockets of resistance'. As concerned Narramine to Narrabri citizens we are not "NIMBIES", rather we are the ones who have been NIMBIED by the last minute poorly assessed route changes.

I submit the following is the only fair and transparent option for the project to repair the damage caused to the community:

The Narramine Western alignment as chosen in 2010 IRAS report is the most cost effective, minimal impact, shortest route for the N2N.

We ask that ARTC returns to the alignment route selection phase and undertakes an independent, transparent, unbiased evaluation of all study areas, concept and alternative options. This information and the underlying data must be made available to community. Any evaluation must provide equal opportunity for impacted landholders and community to be consulted. It must base its decisions on sound scientific assessments of all impacting factors. It must clearly and consistently inform the community of all potential impacts and provide fair hearing opportunity for residents to discuss and resolve impacts, issues and resolutions.

If this rail absolutely must go ahead then build the well researched 2010 concept alignment and save the money for where it will be needed. Do it but do it once with minimal impact. Remove party politics and work for the benefit of our communities. We demand, as the funders and ultimate 'owners' of the project, that due diligence, duty of care, transparency and accountability are used at all stages of development and implementation.