Response to Draft Environmental Impact Statement for the Border to Gowrie Section of the Inland Rail Project

April 2021

1. Background

Inland Rail is a nationally significant transport initiative. Connecting Melbourne and Brisbane via regional Victoria, New South Wales and Queensland, this 1,700km rail project will be delivered by the Australian Rail Track Corporation (ARTC), in conjunction with the private sector and consists of 13 distinct project sections.

Five of these project sections fall within Queensland, with the Border to Gowrie (B2G) section traversing through the Goondiwindi and Toowoomba Regional Council areas.

Due to the scale of the project, on 9 April 2018 the B2G Section of the Project was defined as a 'Controlled Action' by the Delegate of the Commonwealth Minister for the Environment and Energy and subsequently declared by the Queensland Coordinator General to be a coordinated project for which an environmental impact statement is required, pursuant to section 26(1)(a) of the State Development and Public Works Organisation Act 1971.

In January 2021, the Coordinator-General released the draft Environmental Impact Statement (EIS) for public and government agency submissions.

Given the significance of the project and its potential to create both positive and adverse impacts for communities in the Goondiwindi Regional Council area, Council has prepared this submission to the Draft EIS with assistance from GenEng Solutions.

This submission was endorsed by Council at its meeting on 28th April 2021 for formal adoption.

2. Approach and Priorities of Goondiwindi Regional Council

Goondiwindi Regional Council's (GRC) response to the draft EIS has been guided by its corporate vision to "strengthen our thriving regional lifestyle and prosperous economy"[1].

As an advocate for its community, GRC is acutely aware of the need to work constructively with the ARTC to minimise, mitigate and manage any adverse or unintended consequences of the B2G project. At the same time, GRC also acknowledges that the B2G project has the potential to create new and expanded opportunities for businesses, industries, individuals, and entire local communities.

For these reasons, GRC has a strong interest in ensuring the B2G project is a success and intends to fully participate in the EIS outcomes, which includes a comprehensive schedule of engagements and a significant role for Council in the Social Impact Management Plan (SIMP) implementation and monitoring including:

- Involvement in the development of the Community Wellbeing Plan and the draft Accommodation Management Plan
- Cooperation in joint initiatives with ARTC
- Provision of six monthly feedback during construction on:
  - Results of initiatives to offset impacts on amenity, character and cohesion
  - Project use of housing and short term accommodation
  - Local procurement outcomes
  - Review of annual SIMP reports
  - Participation in annual SIMP reviews
  - Participation in independent review of the SIMP as the end of Year 1, prior to commissioning and during Year 3 operations.

[1] Goondiwindi Regional Council Corporate Plan 2019 – 2024.

In addition to this, GRC will have an active role in working with the ARTC and its sub-contractors to coordinate and manage interfaces between respective infrastructure assets and land. GRC understands the significant project delivery time and its role as advocate for the Goondiwindi Region's community, particularly over the next 10 years of construction and operation.

To support GRC with these activities and ensure it can successfully engage with the ARTC, it is requested that the project be conditioned to:

1. **Provide a financial allocation to GRC over the life of the project to engage a dedicated resource to act as an EIS Coordinator for Council and a single point of contact for the Proponent; and**

2. **Reference and have regard to the *Master Inland Rail Development Agreement (Contract No 9000-0373)* between Goondiwindi Regional Council and the Australian Rail Track Corporation Ltd, which sets out the roles and responsibilities of the parties in dealing with project activities in order to minimise any damage to or interference with the operation and use of assets, third party's utility infrastructure and ancillary works and encroachments arising out of, or in connection with the ARTC project activities.**

Whilst GRC has requested other considerations and / or revisions in the final EIS (as outlined in the section below), these two matters represent the most significant priorities for Council and would, in Council's view, help facilitate the most beneficial outcomes for local communities, the ARTC, and GRC.

3. Analysis of Draft EIS

Goondiwindi Regional Council, along with the GenEng Solutions consulting team have reviewed each chapter of the Draft EIS and identified both areas of concern and opportunity to be addressed and/or expanded on in the Final EIS.

As noted in the submission from Toowoomba Regional Council (TRC), there are a number of inconsistencies, errors and references to outdated technical standards in the Draft EIS that need to be addressed. Rather than list them again here, it should be noted that GRC concurs with comments made from TRC on these matters.

Further, numerous items are identified by GRC in this submission. These are summarised in the table below.

Project Rationale (Chapter 02)
Proposal: Describes the rational for the project (including study of alternative options, benefits, planning context etc). **Comment:** Adequately addresses section 6.7 and 10.1 (e) of the Terms of Reference (TOR).
Project Approvals (Chapter 03)
Proposal: Describes legislation, policies and plans required for the construction of the project. **Comment:** Adequately addresses TOR, legislation and policies up to date.
Sustainability (Chapter 06)
Proposal: Provides summary of sustainability consideration in relation to design, construction and operation of the Inland Rail B2G. **Comment:** Adequate sustainability considerations are in place.

Land Use and Tenure (Chapter 07)
7.6 Potential impacts/7.7 Mitigation measures
Land fragmentation and disruption to access and infrastructure

Proposal: The Proponent proposes to manage the impact through assessment on an individual case-by-case basis in consultation with landowners.

Comment: This case-by-case approach can be divisive in the community without a consistent and transparent approach. While there may be no practical alternative approach it is proposed that development of clear guidelines and fact sheets be undertaken for the community to understand the approach.

Land Use and Tenure (Chapter 07)
7.6 Potential impacts/7.7 Mitigation measures
Alterations to barrier fences

Proposal: Where severance of a biosecurity fence is required, it is anticipated that fence realignment and reconstruction will be undertaken as an early works package prior to the construction of rail infrastructure commencing.

Comment: This approach is supported, however, there is possibility of damage to the biosecurity fence during construction and operations if the works crews are not informed of the significance of integrity of these barrier fences. It is proposed that work procedures include notification to the controlling authority and fence signage be installed if both the barrier fence and rail boundary fence are integrated.

Land Use and Tenure (Chapter 07)
7.6 Potential impacts/7.7 Mitigation measures
Alterations to stock routes

Proposal: The Project interfaces with the State stock route network, which consists of stock routes and reserves, in 12 locations. In each instance, the reference design has been developed to provide continued connectivity along each stock route.

Comment: The use of stock routes in the traditional sense may be intermittent and in some cases many years apart due to climate impacts. The continuity of stock routes for the traversing of stock should be addressed through community consideration as well as with the controlling authority.

Land Use and Tenure (Chapter 07)
7.6 Potential impacts
7.6.4.3 Impacts to property access
7.7.2.2 Change in land use
Land fragmentation and disruption to access and infrastructure
Property fencing

Proposal: The Project will result in the severance of driveways and informal private access roads to individual properties**.**
ARTC will continue to consult with potentially impacted landowners through the detailed design and construction planning process to develop and implement property-specific measures to avoid or minimise impacts that could affect agricultural enterprises. This will include the identification of:

- Landowners' needs regarding access to the properties and the closure of private roads
- Property infrastructure such as fences, water storages, groundwater bores and irrigation infrastructure that would be affected and need to be considered in compensation arrangements for the property
- The potential for changes in access to natural resources, such as groundwater and overland flow.

Comment: Goondiwindi Regional Council (GRC) is concerned that the solutions offered by ARTC may not provide satisfactory outcomes. GRC propose that EIS conditions should provide adequate support to property owners in negotiating reasonable solutions without cost imposition.

Proposal: As the Project comprises substantial greenfield works in rural agricultural and grazing areas, standard rural fencing will typically be provided according to ARTC fencing procedure, Boundary Fencing ETM-17-02 (available on the ARTC Extranet: extranet.artc.com.au). Where superior fencing is required (for example where tracks are in close proximity to roads and/or communities, or where trespass is anticipated to occur) a 1.8 m chain link boundary fence may be provided.

Comment: Where existing property fencing is constructed to a different functional standard than proposed by the EIS requirement, fencing should be replaced in a "like for like" standard. For example, where properties are currently fenced with exclusion fencing or fencing specific to a stock type such as sheep, replacement fencing needs to meet the same specification.

Land Use and Tenure (Chapter 07)
7.8 Compliance impact assessment

Proposal: As the Project has been declared a coordinated Project, the provisions of local government planning schemes do not apply and therefore assessment of the Project's consistency with the planning schemes is not required.

The temporary footprint allows for a minimum 5m footprint beyond the permanent footprint for site fencing and temporary drainage structures, erosion and sediment control, movement of plant and utilities connections. The temporary footprint provides for the roadworks associated with the construction of the railway, permanent realignments and new roads.

Where existing land use and tenure arrangement or potential impacts have been discussed, these are presented in the context of the permanent footprint, the temporary footprint or the Project footprint (both of the previous footprints combined).

Comment: GRC is concerned from this statement in regards to works associated with the project beyond the combined permanent and temporary project footprint that are not be subject to planning scheme requirements under the declared project arrangements. Land dealings such as reconfiguration of lots and other land use such as temporary camps beyond the footprint should be subject to planning scheme requirements which will control the impact and outcomes. In particular, severance of lots should take into account GRC planning scheme requirements. This issue must be made clear for the negotiating authority on land resumption.

Land Resources (Chapter 08)
8.6 Potential Impact
Soil Conservation Plans

Proposal: The rail alignment crosses multiple soil conservation plans that may or may not be active. The approach is to modify and revegetate.

Comment: The disruption to existing soil conservation plans, whether they are active or in suspended state, will require detail review for local catchment runoff given the possible impact to road assets. Any change to the overland flow paths will require consultation with GRC should the change impact the road network.

Land Resources (Chapter 08)
8.7 Mitigation measures
Spoil Management Strategy

Proposal: The construction of the alignment will aim for balanced cut and fill however it is noted that the project will create a spoil requirement. The mitigation approach is to minimise the volume of spoil and reuse spoil.

Comment: Given the soil types along the alignment, there is a very high chance of the need to dispose of spoil. The Proponent proposes that the Spoil Management Strategy will be used to manage the spoil. Changes in ground height may trigger an Operational Works Development Application. Alternatively, if there is no formal mechanism for spoil control, GRC should be consulted if the stormwater flow paths have been changed. The draft EIS should be conditioned to include GRC in the review of the Spoil Management Strategy implementation.

Landscape and Visual (Chapter 09)
8.6 Potential Impact
View Point No 2 (Yelarbon)

Proposal: The assessment of the impact to the township of Yelarbon (Viewpoint2) is considered to have moderate sensitivity. The project will remove existing rest area from use during construction then reinstate. The construction of the Cunningham Highway on the western side of town has been identified as a high magnitude of change.

Comment: The impact to the township of Yelarbon will be considerable as the rest area is used on a daily basis. While it is noted that it is of a temporary impact, the time taken to establish a similar visual aspect could be a number of years. Consideration should be given to undertake a fast-tracked approach to establish

an ascetic background. A decision on the level of treatment to the embankment should ensure the town community has an input into the visual treatment of the large embankment. The draft EIS should include local community involvement in the redevelopment of the Yelarbon rest area.

The GRC is also concerned on the visual impact that may have on the effectiveness of Council's tourism strategy. In particular the grain silos provide attractive backdrops for rural scenic values. The overall impact of the project on the tourist visitation is a concern and should be addressed in the EIS.

Flora and Fauna (Chapter 10)

Proposal: Identifies ecological values within the impact assessment area, assess the potential impacts and identify mitigation measures.

Comment: Clearing will directly impact:

- populations of threatened flora (Homopholis belsonii, Digitaria porrecta and Picris barbarorum)
- several of concern and endangered regional ecosystems

Potential Threatened Ecological Communities (TEC's) in the project area were not mapped during field surveys.

The proposed Construction Environmental Management Plan (CEMP) will include measures for weed surveillance and treatment during construction and rehabilitation activities, reducing the potential impacts from biosecurity risks to adjoining land and agricultural properties. The Proponent should ensure these programs are sufficient at reducing weed incursions across the project area, in particular on access roads adjoining the rail corridor.

A Biosecurity Management Sub Plan will be developed as a component of the CEMP. As weeds are common, it is suggested that the Proponent has input from land holders on weeds that will impact farming etc.

Direct impact of wildlife though vehicle strikes etc., due to increased traffic and road construction: The EIS has recommended fauna fencing to mitigate this, potential for further mitigation measures (e.g., reduction of speed limits and fauna signs to be implemented).

Fauna fencing details will be developed during the detail design phase. The Proponent should clarify type of fencing, location and ensure impact to residents is minimised, appropriate consultation required.

The project alignment intersects the wild dog check fence (which GRC maintains) at four (4) locations. The EIS has stated the fence will be reinstated on the northwest side of the rail corridor in accordance with the design solution agreed with GRC through the detail design process. Communication between the Proponent and GRC will be required to achieve appropriate mitigation measures.

Where the Project crosses the Darling Downs Moreton Rabbit Board (DDMRB) fence at chainage Ch 120.2 km, the fence will be reinstated and a rabbit trap will be established in accordance with the design solution developed in consultation with DDMRB through the detail design process.

The EIS has stated that a complaint hotline for the Project will be established and advertised to enable members of the public to notify ARTC of issues, including concerns regarding weeds and pests.

Translocation of specimens to be undertaken where appropriate for a species and where there is documented record of previous translocation.

Trials/schemes.

Phytophthora cinnamomic and Austropuccinia psidii have been identified as potential pathogens on site, therefore a potential for works to spread other pathogens. The draft EIS should ensure any concerns for pathogen spread is addressed by the Proponent.

The EIS has stated that a Project Offset Plan will be developed in order to provide for the staged delivery of offsets ahead of relevant clearing work and the location of these areas need to be identified.

Draft EIS conditions should include a requirement for GRC to be engaged in both the Biosecurity Management Sub Plan and Project Offset Plan. Issues relative to pests and weeds that are raised in the complaint hotline should also be referred to GRC for its data base and future monitoring.

Air Quality (Chapter 11)

Proposal: Provides an assessment of the impacts on the environmental values of air and subsequent impacts on sensitive receptors.

Comment: Sensitive receptors were identified via a desktop review of aerial imagery and no site verification was undertaken. The Proponent is to conduct field verification of this.

There is potential to implement constant monitoring of rainwater tanks to measure the impacts of dust deposition on nearby residences. The Proponent should ensure stockpiles are located at an appropriate distance from any residences.

The draft EIS should be reviewed in order to address these issues above.

Surface Water (Chapter 12)

Proposal: Provides an assessment of the impacts of the proposed project of surface water resources and water quality.

Comment: The Proponent should provide a plan for monitoring surface water quality during construction and operation phases. This monitoring plan should be included in the draft EIS.

Surface Water (Chapter 12)

12.8.1.3 Impacts to surface water availability and users

Construction Water Sources

Proposal: ARTC recognises water sourcing and availability is critical to supporting the construction program for the Project. Sources of construction water will be finalised as the construction approach is refined during the detail design phase of the Project (post-EIS). Through this process, detailed water demand planning will be undertaken, including detailed contingency options, in the event that protracted dry seasonal conditions prevail and water supply options become unavailable.

Comment: Recent experiences of high frequency of longer drought periods is a concern for water security of urban water supply. Water security is a high priority for GRC and therefore so is the use of water for construction purposes. The possibility of an exemption for the Proponent to use water is a concern as there may be no ability for the Council to object to this accessing of water within the source of the urban supply and its catchments. The conditions of approval must acknowledge GRC concerns and ensure the security of the urban water supplies are not compromised.

Groundwater (Chapter 13)

Proposal: Addresses the potential impacts of the project on groundwater resources.

Comment: Impacts of groundwater have been considered; however, the Proponent should ensure the following is addressed in the draft EIS:

- Updated bore reports should be obtained prior to construction to ensure no new bores are impacted;
- Groundwater quality may be affected by spills and leaks from heavy machinery, drill rigs;
- Ensure a Groundwater Management and Monitoring Program (GMMP) and Hazardous Materials Management Sub-Plan are followed.

Noise and Vibration (Chapter 14)

Proposal: Provides an assessment of the potential noise and vibration impacts of the project and subsequent impacts on sensitive receptors.

Comment:

- GRC has overall concerns about the operational noise and vibration impacts on the individual properties along the rail line and expects the Proponent will provide specific mitigation to these properties. It is requested that the EIS conditions assist the property owners in the negotiations with the Proponent in achieving a satisfactory outcome.
- GRC has specific concerns with the noise and vibration within the township of Yelarbon. Mitigation should address the social impacts of the additional and accumulated noise of the road and rail adjacent to the town. To monitor the effectiveness of the mitigation GRC, requests permanent noise monitoring to be installed and remotely monitored so that the community can raise substantiated concerns of breach of the conditions by the operations of the project

The Proponent should identify where controlled blasting will follow the results of the geotechnical report.

Social (Chapter 15)

Management of Social Impacts through the Social Impact Management Plan (SIMP)

Proposal: This chapter describes the results of the Social Impact Assessment (SIA), which under the Project's Terms of Reference (TOR), must assess the type, level and significance of the Project's social impacts (both negative and positive) throughout the Project's lifecycle.

Comment: Where social impacts are likely, concerns raised by GRC following consultation (per draft EIS notes) are proposed to be addressed through the Social Impact Management Plan (SIMP) (refer to section 15.9), which provides a comprehensive suite of actions and initiatives to mitigate social impacts and enhance the project's benefits. For example, working with GRC's Regional Skills Investment Strategy Officer to identify and implement opportunities for skill development and business participation; progressing the Inland Rail Skills Academy; as well as the development of a Community Wellbeing Plan, Accommodation Management Plan and more broadly integrating these initiatives with the Inland Rail's Social Performance Program.

From GRC's perspective the draft EIS contains a range of comprehensive measures by the Proponent to ensure the social impacts from the project are monitored, mitigated and/or managed.

Social (Chapter 15)

Capacity to Engage and Leverage Project Benefits

Proposal: The SIMP notes that there is a role for Council in SIMP implementation and monitoring including:

- Involvement in development of the Community Wellbeing Plan and draft Accommodation Management Plan
- Cooperation in joint initiatives with ARTC
- Provision of six-monthly feedback during construction on:
  - Results of initiatives to offset impacts on amenity, character and cohesion
  - Project use of housing short term accommodation
  - Local procurement outcomes
  - Review of annual SIMP reports
  - Participation in annual SIMP reviews
  - Participation in independent review of the SIMP at the end of Year 1, prior to commissioning and during Year 3 operations.

Additionally, the draft EIS points to the comprehensive 'Engagement' Strategy that will be undertaken:

- Pre-approval
- Post approval
- During operations and supported by a:
  a) Community Reference Group
  b) Community Liaison Officer
  c) Community Relations Monitor; and
  d) Complaints and Feedback Procedure

Comment: Specific engagement initiatives with GRC are outlined in Table 15.21 and are comprehensive. Whilst the Proponent's engagement schedule with Council is positive, it points to a resourcing issue for GRC. As such, it is requested that the project be conditioned to provide a financial allocation to GRC over the life of the project to engage a dedicated resource to act as an EIS Coordinator on behalf of Council and a single point of contact for the Proponent.

Social (Chapter 15)

Temporary Non-Resident Workforce Accommodation

Proposal: Temporary non-resident workforce accommodation locations are proposed in the vicinity of Millmerran (Turallin), Inglewood and Yelarbon, accommodating up to 300 workers at peak, with potential impacts on demand for health services and concerns about community safety, resulting from large numbers of non-local personnel being around small communities and homes.

Comment: The draft EIS highlights that GRC's preference is for non-resident workforce accommodation to be located at Inglewood and Goondiwindi, with the latter being the preferred location to Yelarbon. Despite Council's preference, the draft EIS states that it is not possible to locate a facility at Goondiwindi due to travel time and issues associated with fatigue management.

The draft EIS describes that the workforce accommodation will be self-contained and supported by ancillary infrastructure. Notwithstanding these infrastructure provisions, there is still the potential that the workforce accommodations will have impacts (both material and marginal) on GRC infrastructure and services.

It is requested that the supporting infrastructure associated with the workforce accommodation also include and give consideration to:

- Design requirements and building materials of structures
- Landscaping and aesthetics requirements
- Boundary fencing
- Lighting
- Emergency services arrangements, such as fire
- Internal road standards
- Waste disposal – use of council waste and transfer facilities
- Road frontage and intersection standards with the local road network
- Signage
- Transportation provisions to and from the site
- Liquor licensing
- Removal of structures and rehabilitation of the site

Social (Chapter 15)
15.6.1.1 Goondiwindi Local Government Area

Proposal: Characteristics of local communities that may be affected by the project.

Comment: No discussion of who the identified Aboriginal Parties are, how many Indigenous people live in the community, or any of the conditions that they live under. This should be addressed in the draft EIS.

Social (Chapter 15)
15.6.2 Potentially Impacted Communities

Proposal: Characteristics of local communities that may be affected by the project.

Comment: No discussion of who the identified Aboriginal Parties are, how many Indigenous people live in the community, or any of the conditions that they live under. This should be addressed in the draft EIS.

Social (Chapter 15)
15.6.4.1 Indigenous Community Values

Proposal: A summary of Indigenous communities.

Comment: This should be included in with the previous headings. It is unclear which Traditional Owners belong to which localities. This should be addressed in the draft EIS.

Economic Assessment (Chapter 16)

Proposal: An Economic Impact Assessment (EIA) has been prepared to identify the potential economic impacts of the proposed Inland Rail – Border to Gowrie Project on the local and regional area as well as the State. It does this through undertaking an:

- Evaluation of the Existing Economic Environment
- Economic Benefits Assessment
- Regional Impact Analysis
- Local Economic Impact Assessment; and
- Cumulative Impact Assessment

Comment: Whilst the results of the economic benefits assessment are positive, the draft EIS also highlights that the project will cause disruption to the agriculture and tourism industries by reducing the productive capacity of some farms and reducing tourist numbers to the region due to changes in amenity, connectivity and access to local landscape attractions.

These disruptions combined with the consequences of land acquisitions may affect property values and local incomes, which has the potential to affect GRC own source revenues. At the same time, it is likely that GRC's budget allocation for infrastructure projects may be impacted as a result of work associated with road and level crossing infrastructure upgrades/augmentation.

Whilst the project offers significant regional and state level economic benefits, impacts on GRC's financial sustainability should be considered in light of potential loss of own source revenues coupled with impact due to road and level crossing infrastructure upgrades.

Cultural Heritage (Chapter 17)
17.5 Existing Environment

Proposal: Informed by relevant Indigenous and non-Indigenous values or conditions, informed by desktop research and field investigations.
Comment: Table 17.12 – Why was the search area for 1km for Indigenous values and only 50m for non-Indigenous values? The draft EIS should include a wider search area in consultation with GRC and local communities.

Cultural Heritage (Chapter 17)
17.6 Potential Impacts

Proposal: Potential impacts that may occur to heritage places or sites as a consequence of Project activities.

Comment:

Section 17.6.1 – Unsure of impacts that have been identified due to only specifying within the Cultural Heritage Management Plan (CHMP) and not listing in this document.

Table 17.18 – Poor word choice for heading 'significance' – perhaps should be register. Those listed as none may not have been assessed and this needs to be specified.

Section 17.6.2.2 – There are only two (2) categories – direct OR indirect impacts. There should be a third, being direct AND indirect impacts.

These above sections should be reviewed in the draft EIS.

Cultural Heritage (Chapter 17)
17.9 Cumulative Impacts

Proposal: Cumulative impacts in relation to cultural heritage.

Comment: Considered adequate as the draft EIS addresses cumulative impacts with enough detail.

Cultural Heritage (Chapter 17)
17.10 Conclusions

Proposal: Conclusions.

Comment: Should the CHMP cover maintenance of the existing rail corridor? The assertion that "The assessment of non-Indigenous heritage values and impacts has been undertaken by a team of appropriately qualified heritage specialists and has used a combination of register searches, historical and archival research to identify areas of high cultural heritage potential within 1 km of the Project" is overstated, as some searches were only conducted within 50m of the project.

This should be reviewed in the draft EIS.

Traffic, Transport and Access (Chapter 18)
18.3 Policies, standards and guidelines
Guideline to Traffic Impact Assessment, December 2018 (GTIA) (DTMR, 2018)

Proposal: The Guideline to Traffic Impact Assessment (GTIA) has been used as a point of reference for the traffic and transport assessment, as it relates to roads and intersections affected by the construction and operation of the Project. GTIA provides information about the processes involved to assess road impacts triggered by a proposed development. While it is not mandatory, the GTIA provides a basis for the assessment of road impacts and has been adopted for the preliminary assessment on traffic and pavement impacts by the Project.

Comment: The use of the *Guideline to Traffic Impact Assessment* focuses on the impacts of level of service in terms of road volume capacity rather than structural capacity and consumption of useful life of pavement, with an increased number of Equivalent Standard Axles (ESA's). A local government local road impact

assessment should be based on an asset management approach, rather than a just a service volume approach.

Therefore, an additional method of assessment other than just traffic volume impacts on local government roads is required. It is suggested that in the circumstance of low volume unsealed roads, the use of Dilapidation Reports, which involves before and after pavement assessment, be undertaken in order to assess damage, required repairs and compensation paid where necessary. This option does not preclude an initial pavement strengthening where necessary as identified by Council, however, condition of the road network utilised during rail construction of the B2G section will require monitoring and rectification at no cost to Council. Regardless of the work undertaken on roads, the Proponent should be required to repair damage associated with construction activity prior to commissioning or pay compensation to GRC to rectify the damage.

Clearly, there would be a requirement for an independent assessor and arbitrator for determination of the outcome from the Dilapidation Report.

The Master Inland Rail Development Agreement (MIRDA) has been drafted to address Council assets that will be impacted by the project. The draft EIS should acknowledge the MIRDA and the EIS conditioned in order to ensure that contract arrangements will address the impacts to assets.

Traffic, Transport and Access (Chapter 18)

18.4.1.1 Construction transport routes

Proposal: It is worth noting that the determination of the final construction and heavy vehicle (HV) routes will be subject to consultation between DTMR, the local government authority and the Principal Contractor during the next phase of the Project and may involve the construction of temporary work and/or amendments to the permanent road network.

Comment: Deferral of the final construction detail to construction phase exposes local government to an assessment process to determine a solution, without the support of legal processes to manage the impact to community infrastructure. The Proponent controls the contractual outcomes for the project through the specification of deliverables. For contract and asset management certainty, both the contractor and GRC would require the outcome to be defined prior to the tender process.

The cost impact to GRC to undertake these assessments should not be borne by the local community.

The MIDRA process and outcomes should be acknowledged in the draft EIS as the mechanism to address impacts on construction routes.

Traffic, Transport and Access (Chapter 18)
18.4.1.2 Operational transport routes

Proposal: It is expected that the number of vehicle movements during operation of the Project will be very low relative to overall regional traffic volumes**.**

Comment: It should be noted that the life of the project is undefined and therefore there may be future impacts such as natural disaster recovery works and major replacement works over the life of the asset. The Proponent has understated potential impacts of the operational phase of the proposal. Therefore, it may not be accurate in dismissing operational impact. This issue should be reviewed in order to acknowledge future impacts that may be outside the control of the Proponent, however, the cost of operational impact should not be borne by the local community.

The draft EIS and its proposed approval conditions should acknowledge possible future asset impacts over the entire life of the project.

Traffic, Transport and Access (Chapter 18)
18.6.1 Rail network (Road–rail intersections)

Proposal: The ONRSR has undertaken a detailed audit of the reference design for the Project against the Rail Safety National Law (Queensland) Act 2017 (Qld) and the intent of the ONRSR Policy: Level Crossings (ONRSR, 2019a). This audit concluded that the reference design complies with the Rail Safety National Law and that the design minimises safety risks SFARIP.

The Proponent has conducted, and will continue to undertake, consultation with DTMR and local governments in relation to the preferred road–rail interface treatments for each location.

Comment: ARTC has identified that Kildonan Road and Millmerran Inglewood Road should have active level crossings installed, rather than an anticipated grade separation. It is noted that Millmerran Inglewood road is crossed three times and two of these crossings are grade separated. The crossing at reference point 310-24-P-2 is an active crossing.

GRC is not in agreement with this proposal and considers that consistency should reflect the *State Government's Queensland Level Crossing Safety Strategy, Transport and Main Roads, July 2012* which has a key action "*Seek alternatives to the building of new level crossings*". GRC requires the draft EIS to acknowledge that these two (2) roads interfaces, as a minimum, be Grade separated in accordance with the above State Government strategy.

GRC requests alternative design consideration be given to reducing the three crossings of Millmerran Inglewood Road to a single crossing.

Traffic, Transport and Access (Chapter 18)
18.6.1 Rail network (Short Stacking)

Proposal: In consultation through the development of the reference design, DTMR requested that separation distances be sufficient to allow for storage of two 42.5 m A-triple vehicles. As discussed above, assessment of the existing road network indicates that 42.5 m A-triple vehicles do not use roads in proximity to the Project alignment; therefore, ARTC has retained a minimum separation distance of 49.5m for the purpose of the reference design.

Comment: The issue of short stacking on local government roads should, to some degree, reflect the requirements of that of DTMR. While there is currently little demand on some of the GRC roads, future development of properties should not be restricted by the Proponent's proposed solution. Once the physical locations of alignment road and rail relative to each other are determined and constructed there is potentially no opportunity to rectify the situation into the future.

The type of development on many of these roads will rely upon the use of productivity improvements in the heavy vehicle industry. Therefore, provision of short stacking should be further considered regarding its impact on local government roads. Without a definitive assessment, it is proposed that the short stacking distance in the draft EIS be the same as adopted for the DTMR network to avoid any restrictions of possible property developments into the future.

Traffic, Transport and Access (Chapter 18)
18.6.2.5 Level of Service comparison

Proposal: Although there is a change in the operational LOS for the above-mentioned roads, the expected operational LOS B and LOS C are considered acceptable given the short duration of the construction activities. The operational performance of each road would be expected to return to base conditions after construction is complete; therefore, based on the LOS comparison, it is expected that the Project would not generate the need to upgrade the road network for such a short duration of impact.

Comment: The use of a level of service (LOS) methodology on low traffic rural roads with narrow and non-structural pavements does not predict the need to upgrade specific roads which will be used by heavy vehicles. Damage to the pavement may be substantial, particularly if the traffic movement coincided with wet weather. It is very likely that this circumstance may result in a "one pass" failure of the road pavement.

The MIRDA is the mechanism to manage impacts to low traffic rural roads through the dilapidation assessment process.

Traffic, Transport and Access (Chapter 18)
18.6.2.6 Intersection analysis

Proposal: These upgrades are required only temporarily for construction traffic; therefore, discussions will be required with DTMR and local governments during the detail design phase to determine the permanence of such upgrades. Given the short duration of construction-related traffic, traffic management strategies may be introduced as an alternative to more permanent treatments in order to mitigate construction-related traffic impacts at intersections.

Comment: GRC will require input to the project's traffic management strategies on an ongoing basis. Many of the intersections on the GRC road network that connect to the DTMR network have not been constructed to a standard that could accommodate the traffic type intended, however, the TMR/local government protocol for road management responsibility identifies the extent of intersection managed by DTMR as being to the tangent point on a local government road.

GRC propose that the draft EIS should note the controlling authority on intersections and traffic management strategies; however, any damage to intersections should be rectified in accordance with the MIRDA principles.

Traffic, Transport and Access (Chapter 18)

18.6.2.7 Pavement impacts

Proposal: An increase in the total vehicle and heavy vehicle movements on the existing road network has the potential to result in the accelerated degradation of the trafficable surface.

Comment: Pavement assessment was limited to **s**tate-controlled roads. Local government road network has narrow low strength pavements and are more likely to have adverse pavement impacts and should be mitigated. Depending on weather impacts it is possible to sustain a "one pass" pavement failure. Therefore, the local government road pavement impact should be addressed as well as state controlled roads.

Dilapidation reporting mechanisms should be considered in order to assess the before and after impact to pavements in order to assess damage and the compensation to rectify that damage. Should the Proponent elect to contract the damage liability to the Principal Contractor, GRC will be exposed to the risk of negotiation therefore, GRC consider that the Proponent should be held ultimately responsible for the damage. As stated previously, an arbitration process is necessary in order to resolve disputes with the Proponent on resolution of these issues.

The MIRDA mechanism should be acknowledged in the draft EIS as the process to undertake mitigation of traffic impacts.

Traffic, Transport and Access (Chapter 18)

18.6.5 School bus routes

Proposal: The increase in construction traffic, particularly heavy vehicle traffic, has the potential to impact the journey time and safety of school bus routes.

Comments: The draft EIS has not identified the impact to the student bus transfers at the Yelarbon rest area. As it is proposed the rest area be utilised for a laydown area this issue will require a mitigation solution in the EIS.

Traffic, Transport and Access (Chapter 18)

18.6.8 Cycling and pedestrian network

Proposal: Some of the proposed construction routes are aligned through areas of moderate-to-high pedestrian activity through the areas surrounding the towns of Yelarbon, Inglewood, Millmerran, Brookstead, Pittsworth and Toowoomba. Significant increases in heavy vehicle movements through these locations may adversely impact pedestrian movements; however, most of these routes are currently facilitating a high proportion of heavy vehicle movements (refer Table 18.27). Therefore, the addition of construction traffic to these routes is unlikely to result in a significant increase in risk to pedestrians

Comments: The construction activity and resulting heavy vehicle movements in and around Yelarbon is significant in comparison to the current level of heavy vehicle movements. The use of the rest area as a laydown area and the construction of the high embankment for the grade separated crossing and the modification to the levee will require additional bulk haulage.

The EIS should identify mitigation measures to avoid the impacts to pedestrians in the Township of Yelarbon. Similarly, reference designs do not provide a solution for a pedestrian crossing of the alignment within Yelarbon and GRC requests the Proponent be conditioned to provide a compliant solution for a pedestrian crossing within Yelarbon.

Traffic, Transport and Access (Chapter 18)

18.6.9 Emergency services

Proposal: During construction and operation, response times for emergency services may be delayed if they encounter significant roadworks or passing trains at level crossings. ARTC will work with the relevant emergency services agencies (e.g. Queensland Fire and Emergency Service (QFES), Queensland Ambulance Service (QAS) and Queensland Police Service (QPS)) to develop protocols and joint working arrangements to address potential impacts on emergency services and service response times during construction and operation, and ensure that access is retained as required**.**

Comments: The closure of a road either temporarily or permanently is a high risk for emergency response. Consideration should be given to utilising both Council and TMR road closure internet systems for notifications such as the "QLD Traffic App".

The draft EIS should include road authorities in the road closure arrangements with emergency services.

Traffic, Transport and Access (Chapter 18)

18.7 Mitigation measures

18.7.1 Mitigation through the reference design phase (Road–rail interfaces)

Proposal: Grade-separated crossings of existing roads have been adopted instead of level crossings, where possible. The specific design treatment at each road–rail interface has been selected based on a combination of factors, which include:

- Topography
- Road classification
- Rail geometry
- Road geometry
- Community and stakeholder feedback through consultation

Comment: GRC consider the rail road interface at Kildonan Road and Millmerran Inglewood Road should provide grade separation as per the above mitigation measure. These roads are considered to be highest order components of the road network within the Goondiwindi Region. Given the expectation of the community that the road network should be fit for future purpose upon completion of works, the grade separated outcome should be provided as part of this project.

The draft EIS should have a clear mechanism for assessment of the road rail interface and require grade separation at interfaces on Kildonan Road and Millmerran Inglewood Road.

Traffic, Transport and Access (Chapter 18)

18.7 Mitigation measures

18.7.2 Proposed mitigation measures (Detail design/Road safety)

Proposal: A Traffic Management Sub-plan will be prepared prior to the commencement of construction, as a component of the CEMP, as a joint effort between the Principal Contractor, ARTC, DTMR, QR, local governments and an accredited road safety auditor once preferred construction routes are confirmed.

Comment: GRC notes that the Principal Contractor will be a party to the Traffic Management Sub Plan and while this is appropriate, the heads of agreement in delivering the project should remain between ARTC and GRC.

The MIRDA has a mechanism for transferring local government requirements to the principal contractor and the draft EIS should acknowledge this process.

Traffic, Transport and Access (Chapter 18)

18.7 Mitigation measures

18.7.2 Proposed mitigation measures (Detail design/ Road network)

Proposal: Identify secondary, alternative construction routes, in the event of the primary route is blocked off by an emergency/accident.

Comment: Any use of alternative construction routes should be agreed with GRC prior to the Traffic Management Sub Plan being agreed to and duration of use of the alternative to be limited. The same conditions should apply to alternative routes as to the agreed construction routes.

The draft EIS should reference consultation with local government on possible alternative routes in order to avoid an emergency situation where the alternative route may not be suitable under specific circumstances.

Traffic, Transport and Access (Chapter 18)

18.7 Mitigation measures

18.7.2 Proposed mitigation measures (Detail design/ Road network)

Proposal: A Road Use Management Plan (RUMP) will be prepared for the Project in accordance with the GTIA to support works to the existing road network (refer Figure 18.5). The purpose of developing the RUMP for the Project will be to:

- Identify, where required, appropriate traffic and transport management strategies for the use of the State-controlled roads and local government roads for each of the construction stages of the Project
- Minimise the impact on the efficiency of road networks

Comment: As commented above the GTIA does not have relevance to lower order local government roads. The preparation of a RUMP is supported, provided there is a relevant mechanism to reflect on impacts to local government roads.

While the RUMP will assist in mitigation of road impacts, GRC has concerns with the geometrical design of the State controlled road on the approaches to Yelarbon. The horizontal alignment on the eastern approach results in a frequent truck roll over crashes. Constructing the same arrangements on the western approach potentially creates the same issue. While this is a matter for the Department of Transport and Main Roads, Council is concerned for the safety of the local community and the impact on the local Emergency Services.

The draft EIS should acknowledge the integration of the RUMP with the MIRDA.

Traffic, Transport and Access (Chapter 18)

18.7 Mitigation measures

18.7.2 Proposed mitigation measures (Detail design/ Pavement)

Proposal: For sealed local government roads, a condition assessment will be conducted (e.g. National Association of Australian State Road Authorities roughness count) prior and post construction activities, as well as at annual intervals during construction

For unsealed local government roads, a visual condition will be conducted (either manual or vehicle mounted high speed condition survey) prior to and post construction activities. The scope for pavement assessments of unsealed local government roads will be agreed with relevant local governments before construction commences.

The scope and frequency of pavement condition assessments that are to be required during the construction period will be documented in the RUMP.

Comment: This mitigation measure supports the failure of the GTIA process and to reflect the need for management of impacts to lower order local government roads. GRC supports the approach, provided there is an arbitration process should a dispute occur over both the damage incurred and the level of compensation.

This mitigation measure is referenced in the MIRDA and therefore the draft EIS should acknowledge the process.

Traffic, Transport and Access (Chapter 18)

18.7 Mitigation measures

18.7.2 Proposed mitigation measures (Pre-construction and construction /Road network)

Proposal: Construction works cannot commence within a State-controlled road corridor without written approval from DTMR. This will be required to be obtained through consultation with DTMR during the detail design phase of the Project**.**

Comment: This requirement should also apply to local government roads. GRC has a permit system that will apply to works within a road reservation.

The draft EIS should acknowledge the same requirement for local government approval processes.

Traffic, Transport and Access (Chapter 18)

18.9 Cumulative impacts

North Star to Border (Inland Rail) /Increase traffic volumes on local road network

Proposal: There is potential for construction traffic for both projects to use roads on the Queensland side of the Macintyre River (e.g. Kildonan Road, Wondalli–Kurumbul Road).

Comment: The material supply to both the NS2B and B2G will have an accumulative impact to the road network. Should concrete supply be from the same supplier in Goondiwindi, then adverse impacts to the road network should be considered based on the cumulative impact from the overall inland rail project and not two (2) single projects. Therefore, it is likely that the Proponent should pay compensation to GRC for asset life impacts of the road network.

The MIRDA includes the NS2B section that is located in Queensland, however, material supply into New South Wales for the balance of this NS2B section will have a cumulative impact in terms of road asset consumption. This issue should be addressed in the draft EIS.

Hazard and Risk (Chapter 19)

19.8 Mitigation measures

TABLE 19.11 INITIAL MITIGATION MEASURES OF RELEVANCE TO HAZARD AND RISK

Road–rail interfaces

Proposal: Grade separated crossings of existing roads have been adopted instead of level crossings, where feasible. The specific design treatment at each road–rail interface has been selected based on a combination of factors, which include:

- Topography
- Road classification
- Rail geometry
- Road geometry
- Community and stakeholder feedback through consultation.

Comment: The statement noting "where feasible" is not accurate. Grade separation crossings are physically feasible in some cases however, the Proponent has elected to provide level crossings based clearly on project economics almost entirely.

The draft EIS should acknowledge this issue of road and rail interfaces in order to clearly state the Proponent's intention on grade separation, grade crossings and their potential risk.

Hazard and Risk (Chapter 19)

19.8 Mitigation measures

TABLE 19.12 HAZARD AND RISK MITIGATION MEASURES FUTURE PHASES OF PROJECT DELIVERY

Detail design – Natural Flooding

Proposal: Modification of the existing Yelarbon levee may be the preferred design solution to avoid worsening of hydrological conditions in the Yelarbon area. If this solution is confirmed as preferred through detail design, the design requirements for modifying the existing Yelarbon levee will be confirmed through further consultation with GRC. It is anticipated that the modified levee would be considered a Category 2 levee (Schedule 10 of the Water Regulation 2016), and a waterway barrier, requiring a development approval under the Planning Act 2016 (Qld).

Comment: GRC have concerns on the assessment of the categorisation of the modifications. Council has assessed the levee as category 3 due to the population at risk. EIS conditions should include this requirement in any approval in order for the Proponent to undertake modification in accordance with requirements.

Hazard and Risk (Chapter 19)

19.8 Mitigation measures

TABLE 19.12 HAZARD AND RISK MITIGATION MEASURES FUTURE PHASES OF PROJECT DELIVERY

Construction and commissioning -Natural Flooding

Proposal: Construction tasks will be scheduled to avoid, where possible, bulk earthwork activities within the 1% AEP during periods of elevated flood risk. Where works cannot be scheduled outside of this time period, activity-specific flood readiness and response planning will be required. This planning will be developed in consultation with the relevant local government and QFES.

ARTC will engage with the local disaster management groups for Toowoomba and Goondiwindi to coordinate appropriate incident management and response procedures for natural disasters, including flooding.

Comment: It is noted that the Proponent will engage with local disaster management groups on readiness and response. Given that construction activity will increase the risk of flooding impact, engagement should be during preconstruction phase and procedures should be referenced in construction contracts. Any damages should be included in the liability in the contract.

The draft EIS should be modified to ensure that engagement with local disaster management groups occurs at the preconstruction phase. Further response to natural flooding concerns will be provided in addition to this submission.

Hazard and Risk (Chapter 19)

19.8 Mitigation measures

TABLE 19.12 HAZARD AND RISK MITIGATION MEASURES FUTURE PHASES OF PROJECT DELIVERY

Operation – Natural Flooding

Proposal:

- Inspections will be carried out during operations to identify defects and conditions that may affect waterway and drainage system capacity or indicate increased risk of flooding, such as:
- Scour
- Blockages due to debris build up
- Indication of floods overtopping a structure
- Culvert or drain damage or collapse.
- Where defects are identified and corrective actions are required, these works will be completed in accordance with the Operation EMP for the Project
- Asset inspections will be completed as soon as safe access can be achieved following a flood event

Comment: Culvert design should include an allowance for a partial blockage of the structure. Failure to inspect and maintain the waterway area, which may cause impact, should be considered as a breach of EIS conditions and the Proponent be subject to compensation for any damages caused by lack of operational neglect.

EIS conditions should enforce that the Proponent meets design capacity of the culverts including blockage in accordance with industry standards.

Hazard and Risk (Chapter 19)

19.8 Mitigation measures

TABLE 19.12 HAZARD AND RISK MITIGATION MEASURES FUTURE PHASES OF PROJECT DELIVERY

Operation – Dangerous goods and hazardous chemicals

Proposal: Procedures for the management of hazardous chemical spills and leaks will be developed and incorporated into the Operation EMP for the Project

Comment: The Proponent should consult with local disaster management groups on procedures and their response to high impact hazardous material incidents which may require activation of the group following an incident. This requirement should be included in the draft EIS.

Hazard and Risk (Chapter 19)

19.9 Impact assessment summary

TABLE 19.13 IMPACT ASSESSMENT FOR POTENTIAL IMPACTS ASSOCIATED WITH HAZARD AND RISK

Pre-construction and construction - Accidents due to increased number of road/rail interfaces

Proposal: The risk assessment has been assessed in the Operation phase in terms of Likelihood/consequences – Risk for accidents on road / rail interfaces as:

Likely/ major – Very High and after mitigation Possible/ Major – Medium.

Comment: A hazard with a likelihood of 'possible' and consequence of 'major', is considered 'high' rather than 'medium'. This suggests the risk treatment should be readdressed. The draft EIS should address this error in the risk assessment and consider an appropriate risk treatment and control.

Hazard and Risk (Chapter 19)

19.9 Impact assessment summary

19.9.2 Residual risks

Proposal: The residual risk of the road/ rail interface remains at medium level.

Comment: This is not considered correct as the likelihood is 'possible' and the consequences remain 'major', therefore, the risk is 'high'. The risk treatment should be readdressed. The draft EIS should address this error in the risk assessment and consider an appropriate risk treatment and control.

Waste Management (Chapter 20)

Proposal: Describes baseline conditions of the impact assessment area and assesses potential waste impacts associated with the B2G project.

Comment: Waste facilities within the proximity of the project area within GRC boundaries include:

1. Goondiwindi Transfer Facility and Landfill
2. Yelarbon Landfill
3. Inglewood Landfill

It should be noted that Yelarbon and Inglewood are transfer stations and not landfills with the exception that commercial waste is accepted at Inglewood one day per week. This should be amended in the draft EIS.

No waste facilities have been specifically identified as potential spoil disposal sites for the Project and it is expected that soil will be reused on site, the Proponent should identify facilities that can take soil as a contingency plan if soil disposal is required.

It is anticipated that waste volumes generated during construction will not be significant, therefore traffic impacts have not been assessed. The Proponent should keep accurate records of waste volumes to ensure that volumes remain within accepted standards.

The draft EIS has stated that consultation with owners and operators of existing waste management facilities has commenced. It is understood this is not the case for facilities within GRC.

Waste disposal by the proponent to Council waste sites requires approval of GRC. Any large volumes of waste may be redirected to alternative sites so as to not impact on waste management sites. Payment of applicable disposal fees should be made to GRC by the Proponent and its contractors for waste accepted at the GRC waste facilities.

The Spoil Management Strategy will be finalised prior to the commencement of construction and this should be reviewed by interested parties.

The draft EIS has stated that a Waste Management Sub-plan will be developed as a component of the Construction Environmental Management Plan (CEMP), it is to be ensured that this is made available for review by GRC.

The draft EIS states that cleared vegetation will be re-used on site. The Proponent should ensure that any restricted weed material is separated and disposed of accordingly. Restricted materials should not be re-used on site.

These above waste facility matters should be reviewed in the draft EIS.

Cumulative Impacts (Chapter 21)
Proposal: This chapter provides a summary of the cumulative impact assessment undertaken for the Project. Projects with spatial and/or temporal overlap can result in cumulative impacts. **Comment:** Adequately addresses cumulative impacts based on current knowledge of surrounding projects. This chapter should be updated if new information arises.
Outline Environmental Management Plan (Chapter 22)
Proposal: This chapter provides an environmental management framework to enable the identified environmental and social outcomes to be achieved. **Comment:** This plan is in a draft stage and should be amended when new information arises.
Conclusion (Chapter 23)
Proposal: Summarises the main outcomes for each chapter of the draft EIS. **Comment:** N/A
Appendix A: Terms of Reference
Proposal: Project has been declared a 'coordinated project' for which an EIS is required. This chapter outlines the TOR the Proponent must address. **Comment:** N/A
Appendix J: Terrestrial Ecology Technical Report
Proposal: This technical report describes the terrestrial ecological values of the impact assessment area an identifies potential impacts to sensitive environmental receptors. **Comment:** BioCondition assessments were omitted from the surveys due to drought conditions, therefore certain habitat and vegetation condition data cannot be obtained. Report does not clearly state whether the Regional Ecosystems (RE's) were ground truthed or not (Table 3.2 only states that RE's were identified). Further ecological surveys will be undertaken during the detail design phase of the Project as the disturbance footprint is refined to reflect the detail design and adopted construction methodology. The Project is likely to cause a 'significant residual impact' on Cyperus clarus, Digitaria Porrecta and Picris barbarorum. These have not been identified in the offset's strategy (Appendix N). The Proponent should provide detail of the types and scale of proposed ecological surveys of the Project footprint during development of detailed design. These above terrestrial ecological matters should be reviewed in the draft EIS.
Appendix K: Aquatic Ecology
Proposal: This technical report has been prepared to document aquatic ecology and surface water quality investigation for the project. **Comment:** Field surveys were taken during drought conditions and therefore may not be a representative of periods of average or above average rainfall. Aquatic samples sites are all located within a 2km buffer of the proposed alignment, further sampling will be required if access tracks/construction camps extend beyond this alignment. The Proponent should ensure that mitigation measures to prevent the spread of aquatic weeds are implemented and accurately detailed in the CEMP. Sediment runoff into water courses and introduction of contaminants into waterways has the potential to impact landholders in the surrounding areas, Proponent should ensure that mitigation measures are appropriately implemented. These above aquatic ecology matters should be reviewed in the draft EIS**.**

Appendix L: Matters of National Environmental Significance (MNES) Technical Report
Proposal: Assesses potential impacts on listed threatened species and communities under the EPBC Act during construction and operation of the Project. **Comment:** The report adequately addresses MNES. Additional surveys to verify TEC's, etc., will be implemented during the design phase.
Appendix M: Primary Fauna Movement Provision and Fencing Strategy
Proposal: This chapter identifies fauna corridors that the Project crosses and nominates the optimal locations for fauna. **Comment:** Adequately addresses fauna fencing and additional landowner consultation requirements such as stock route crossings and the impacts to private fencing.
Appendix N: Environmental Offset Delivery Strategy
Proposal: Outlines current offset delivery strategies for Queensland project areas. **Comment:** Current draft is adequate, however: • Further detailed ecological assessments are required to accurately assess project impact and therefore offset requirements. Therefore, this offset strategy will be subject to change. • Ecological studies will be required to assess proposed offset properties. • The Proponent should provide finalised Project specific Environmental Offset Proposals as they become available to allow for a more accurate assessment of offset deliverables. These above environmental matters should be reviewed in the draft EIS.
Appendix O: Air Quality Technical Report
Proposal: Technical report that details information addressed in Chapter 11. **Comment:** Refer to Chapter 11 comments as further analysis may be required should the current project scope change.
Appendix P: Surface Water Quality Technical Report
Proposal: Technical report that details information addressed in Chapter 12. **Comment:** Details in report are sufficient.
Appendix R: Groundwater Technical Report
Proposal: Technical report that details information addressed in Chapter 13. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **1. Introduction**
Proposal: Introduction to the built heritage impacts for the B2G project undertaken by FFJV. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **1.1 Project Description**
Proposal: Key permanent and temporary features of the project. **Comment:** Details in report are sufficient.

Appendix W: Non-Indigenous Cultural Heritage Survey Report **1.2 Scope of Assessment**
Proposal: Outlines scope of heritage assessment: to Identify, assess significance, assess potential impacts, recommendations. **Comment:** Is 50m enough of a buffer around the project area for impacts to heritage places? For example, historic heritage listed places need to be included, as well as the lot next to them. The draft EIS should be reviewed for the buffer to be increased to at least 100m for all heritage places and include historic heritage up to 500m for example.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **1.3 Authorship**
Proposal: Requirements for qualifications. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **2. Legislation** **2.1 Commonwealth Legislation**
Proposal: EPBC Act. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **2.2 State Legislation**
Proposal: Queensland Heritage Act. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **2.3 Local Government Planning Frameworks**
Proposal: Part 11 QHA; Planning Act 2016; TRC and GRC requirements **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **3. Methodology**
Proposal: Addressing the ToR Requirements. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **3.1 Background Research**
Proposal: Aims of background research. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **3.1 Background Research** **3.1.1 Register Searches**
Proposal: Heritage Registers. **Comment:** WWII and memorial registers should be taken into account here.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **3.1 Background Research** **3.1.2 Analysis of historical mapping**
Proposal: Historical Landscape Impacts. **Comment:** WWII and memorial registers should be taken into account here.

Appendix W: Non-Indigenous Cultural Heritage Survey Report **3.1 Background Research** **3.1.3 Review of Previous Studies**
Proposal: Previous Studies Review. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **3.2 Selection of Site for Inspection**
Proposal: Justification for targeted survey strategy and AIO's. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **3.3 Significance Assessment**
Proposal: Potential impacts on heritage values. **Comment:** It is unclear why world heritage levels of culture heritage sensitivity are used here after defining levels ranging between world and local and impacts between world and local? Sensitivity should be assessed within their relevant level.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **4. Historical Context**
Proposal: Places the proposed works within its historical setting. **Comment:** Although focused on built heritage, this chapter should have begun with (a brief summation of) Aboriginal history as it still contributes to the context and taphonomy of the place.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **4. Historical Context** **4.1 Exploration and Early Settlement**
Proposal: Frontier Era **Comment:** Too much general background here. Moreton Bay is not relevant.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **4. Historical Context** **4.2 Free Selection, closer settlement and the railways**
Proposal: Settlement. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **4. Historical Context** **4.2.1 Kurumbal Station (South Western Line)**
Proposal: Specific Historical Site. **Comment:** Including a specific spatial reference in relation to the works area would be advantageous here, i.e. 45m away from site. Additionally, the current condition of the place.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **4. Historical Context** **4.2.2 Gibinbell Siding (South Western Line)**
Proposal: Specific Historical Site. **Comment:** Including a specific spatial reference in relation to the works area would be advantageous here, i.e. 45m away from site. Additionally, the current condition of the place.

Appendix W: Non-Indigenous Cultural Heritage Survey Report **4. Historical Context** **4.2.3 Yelarbon Station (South Western Line)**
Proposal: Specific Historical Site. **Comment:** Including a specific spatial reference in relation to the works area would be advantageous here, i.e. 45m away from site. Additionally, the current condition of the place.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **4. Historical Context** **4.2.4 Whetstone Siding (South Western Line)**
Proposal: Specific Historical Site. **Comment:** Including a specific spatial reference in relation to the works area would be advantageous here, i.e. 45m away from site. Additionally, the current condition of the place.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **4. Historical Context** **4.2.5 Yandilla Station (Millmerran Branch Line)**
Proposal: Specific Historical Site. **Comment:** Including a specific spatial reference in relation to the works area would be advantageous here, i.e. 45m away from site. Additionally, the current condition of the place.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **4. Historical Context** **4.2.6 Pampas Station (Millmerran Branch Line)**
Proposal: Specific Historical Site. **Comment:** Including a specific spatial reference in relation to the works area would be advantageous here, i.e. 45m away from site. Additionally, the current condition of the place.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **4. Historical Context** **4.2.7 Brookstead Station (Millmerran Branch Line)**
Proposal: Specific Historical Site. **Comment:** Including a specific spatial reference in relation to the works area would be advantageous here, i.e. 45m away from site. Additionally, the current condition of the place.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **4. Historical Context** **4.2.8 Cecilvale Station (Millmerran Branch Line)**
Proposal: Specific Historical Site. **Comment:** Including a specific spatial reference in relation to the works area would be advantageous here, i.e. 45m away from site. Additionally, the current condition of the place.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **4. Historical Context** **4.2.9 Yarranlea Station (Millmerran Branch Line)**
Proposal: Specific Historical Site. **Comment:** Including a specific spatial reference in relation to the works area would be advantageous here, i.e. 45m away from site. Additionally, the current condition of the place.

Appendix W: Non-Indigenous Cultural Heritage Survey Report **4. Historical Context** **4.2.10 Murlaggan Station (Millmerran Branch Line)**
Proposal: Specific Historical Site. **Comment:** Including a specific spatial reference in relation to the works area would be advantageous here, i.e. 45m away from site. Additionally, the current condition of the place.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **4. Historical Context** **4.3 Inland Rail**
Proposal: Historical background on the Inland Rail project. **Comment:** The 2006 Study for Melbourne-Brisbane railway; 2010 study preferred route via Albury, Parkes, Moree and Toowoomba 2015 study; recommends Inland Rail proceed and confirms the preferred route; 2016 Route options assessed; 2018 construction commenced (https://inlandrail.artc.com.au/where-we-go/route-history/). There is more focus on negative community response than history and it does not consider the positive community response https://www.weeklytimesnow.com.au/news/national/budget-2017-inland-rail-funding-of-84-billion-promised/news-story/9eda254632ecfda93e0e0ad873dc93e4. It does not consider early history of Inland rail (https://trove.nla.gov.au/newspaper/article/1499515).
Appendix W: Non-Indigenous Cultural Heritage Survey Report **5. Existing Heritage Context** **5.1 Register Searches**
Proposal: Heritage listed sites directly relating to the Project. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **5. Existing Heritage Context** **5.2 Previous Heritage Assessments**
Proposal: Summary of previous heritage assessment. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **5. Existing Heritage Context** **5.2.1 Brannock & Associates 2010 Toowoomba Regional Council Heritage and Urban Character Study**
Proposal: Summary of 2010 report. **Comment:** Short summary. Needs more critique of the report.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **5. Existing Heritage Context** **5.2.2 Blake, Thom 2011 Goondiwindi Regional Council Heritage Survey**
Proposal: Summary of 2011 report. **Comment:** Short summary. Needs more critique of the report.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **5. Existing Heritage Context** **5.3 Historical Mapping Review**
Proposal: Explanation of historical map review. **Comment:** Why is the percentage of sites included? A justification for this methodology should be included and explanatory figures could also be included here.

Appendix W: Non-Indigenous Cultural Heritage Survey Report **6. Site Inspections**
Proposal: Site inspection methodology. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **6. Site Inspections** **6.1 Inspection Strategy**
Proposal: Explanation for inspection of the AOI's. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **6. Site Inspections** **6.2 Inspection Results**
Proposal: Description of the current state of AOI's. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **7. Significance Assessment**
Proposal: Site inspection methodology. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **8. Potential Impacts**
Proposal: Potential impacts and unmitigated effects assessment. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **8. Potential Impacts** **8.1 Project Activities**
Proposal: Proposed activities and phases. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **8. Potential Impacts** **8.2 Assessing Sensitivity**
Proposal: Sensitivity and impact assessment for each heritage place. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **8. Potential Impacts** **8.3 Potential Impacts and Magnitude of Change**
Proposal: Direct and indirect impacts definition. **Comment:** There are only two (2) categories – direct OR indirect impacts. There should be a third, being direct AND indirect impacts.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **9. Proposed Mitigation Measures**
Proposal: Mitigation measures that have been or will be adopted to mitigate potential heritage impacts. **Comment:** Details in report are sufficient.

Appendix W: Non-Indigenous Cultural Heritage Survey Report **9. Proposed Mitigation Measures** **9.1 Mitigation through the Reference Design Phase**
Proposal: Definition of mitigation measures and controls for during design phase. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **9. Proposed Mitigation Measures** **9.2 Proposed Mitigation Measures**
Proposal: Outline of mitigation measures and controls for during design phase. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **10. Cumulative Impacts**
Proposal: Initial and residual impacts on heritage places, magnitude and significance. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **11. Cumulative Impacts**
Proposal: Requirement under the ToR. **Comment:** Details in report are sufficient.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **11. Cumulative Impacts** **11.1 Method**
Proposal: Details identification and assessment of cumulative impacts on non-Indigenous heritage. **Comment:** Why have only state significant heritage sites been considered and not local? What is the justification for this and what is the ToR requirement?
Appendix W: Non-Indigenous Cultural Heritage Survey Report **11. Cumulative Impacts** **11.2 Cumulative Impact Assessment**
Proposal: Cumulative potential impact to non-Indigenous heritage sites. **Comment:** Why the 50m buffer for impact again? This needs to be explicitly defined and justified.
Appendix W: Non-Indigenous Cultural Heritage Survey Report **12. Summary and Conclusion**
Proposal: Summary and Conclusion **Comment:** Details in report are sufficient.
Appendix X: Traffic Impact Assessment
Proposal: This technical report has been prepared to document traffic impact assessment. **Comment:** Details from Appendix X have been addressed in Chapter 18 – Traffic, Transport and Access. Comments regarding proposals from the traffic assessment are included in the review of Chapter 18 above. The main concern in Appendix X is regarding relevance of the level of Service for the road network on local government roads. An increase in traffic above the 5% target in the level of service approach on low trafficked roads, will generally disqualify the requirement to address volume impact. However, heavy impacts on low structural strength pavements requires alternative methods of impact assessment.

4. Conclusion

This submission highlights a range of issues for consideration by the Coordinator General in finalising the EIS for the B2G section of the Inland Rail Project. As noted in the Introduction, GRC is fully committed to working with the ARTC to maximise the Project's benefits and intends to engage to the maximum extent possible to ensure positive results are achieved. In doing so, it is hoped that the Coordinator General will give due regard to the issues Council has identified and ensure the project is conditioned in such a way so as to support GRC's full participation.