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C/-EIS Project Manager, Inland Rail – Helidon to Calvert Project
Project Evaluation and Facilitation
Office of the Coordinator General
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Dear Ms Power

**SUBMISSION TO DRAFT ENVIRONMENTAL IMPACT STATEMENT
INLAND RAIL- HELIDON TO CALVERT SECTION**

Thank you for your invitation to Lockyer Valley Regional Council dated 30 March 2021 seeking feedback on the Draft Environmental Impact Statement (EIS) for the Inland Rail Helidon to Calvert (H2C) Project. I trust the submission contained in this response (and including the detailed attachments) will inform your evaluation of the project and the adequacy of the Draft EIS.

Council and the Lockyer Valley community have been engaged now for several years on preliminary design information and have conducted many discussions with Australian Rail Track Corporation (ARTC) on early concepts and potential impacts. It is pleasing to finally have technical material that evaluates the impacts of the project. Now Council, the community and decision makers can properly review and understand the project.

Council's concerns for H2C are not new - but the EIS provides for the first time a comprehensive technical submission for Council to consider and assess. Council officers and technical advisors have reviewed the available materials and provide a comprehensive submission (Attached). We have also provided below some overarching issues of concern for Council. The attached submission also contains a brief discussion of the impacts that will be felt by specific town communities if the project retains its current alignment.

It is Council's understanding that with respect to the Lockyer Valley, nowhere else on the entire alignment between Melbourne and Brisbane are townships so directly impacted by new railway construction and operation, with so little benefit and with such a high frequency of trains. Further, it is Council's belief that the Lockyer Valley townships will have long term impacts that are so extreme that these cannot be appropriately mitigated on the current alignment.

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In support of this assertion please see Attachment A that is intended to demonstrate the cumulative effects of a variety of impacts on communities within the Lockyer Valley. Often separate issues (such as noise or flooding or risk) are examined in isolation. When brought together for consideration in a specific location the cumulative impacts are overwhelming. This finding leads to Council's primary recommendation that, now that these impacts are known and informed by the EIS, further consideration needs to be given to alternate alignments particularly around the towns of Gatton and Forest Hill.

Context

This submission should not be considered in isolation. Council has consistently stated its position regarding inland Rail.

To provide background, and by way of example, in 2018 Council approved a *Position Paper* that outlined (at a high level) the principles by which the project ought to be designed having regard to concerns expressed from the community and the Council. These policy positions were supported by both the Member for Lockyer Mr Jim McDonald and the Member for Wright the Hon Scott Buchholz. The principles provided that there should be:

- No loss of connectivity (where the proposed corridor severs existing access, alternate access should be provided of comparable or better standard)
- No flood impacts (from new rail corridors and where existing rail corridor is utilised the opportunity should be taken to improve flood resilience)
- Mitigated amenity impacts (noise, vibration, light, visual, dust, smell)
- Limited (as far as possible) loss of good quality agricultural land
- Promotion of integrated transport planning (to allow for future passenger transport and the support for active transport)

A copy of Council's *Position Paper* is included as Attachment B.

Similarly, Council made a submission to the *Senate inquiry into the Management of the Inland Rail project by the Australian Rail Track Corporation (ARTC) and the Commonwealth Government*. The submission outlined Council's ongoing issues regarding the financial arrangement of the project, route planning and selection processes, connections with other freight infrastructure, the level of meaningful engagement on the route alignment, and economic development opportunities. A copy of Council's submission is included as Attachment C. The Chief Executive and other officers expanded on these concerns at a Senate Hearing in January 2020 (which is available in Hansard).

Council has always held serious concerns about the impacts of the H2C project but has waited on the EIS so as not to pre-empt your consideration of the project and to have some credible information to assess. The EIS states "there is potential for project operations to have long-term effects on amenity (primarily through rail noise) and connectivity near the rail corridor" and "with a design life of 100 years, the project's operational impacts... may be experienced for the long-term." Of even more concern is that Council's consultants and officers believe the impacts are significantly understated in the EIS. This is reflected in our detailed submission in Attachment D.

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Route Alignment and Passenger Rail

As pointed out in Council's Submission to the Senate Inquiry, Lockyer Valley Regional Council has been advocating for improved public transport for many years. This has included seeking the introduction of passenger rail. Such services would be of substantial benefit to the broader region and the transport network in SEQ.

On the basis of future passenger rail, Council has been supportive of the protection of the Gowrie to Grandchester Rail Corridor that was planned by the State Government in 2002/03. The associated Study at that time envisaged both freight and passenger services. It seems to Council that a fundamental flaw in the route planning for Inland Rail has been the requirement for ARTC to utilise the Gowrie to Grandchester alignment- for an Inland Rail that is categorically a freight only railway. As a general rule, freight railways seek to avoid communities to minimise impact. Correspondingly, passenger rail corridors seek to connect and integrate with the communities that will utilise the passenger services. It is understood that ARTC have been required by the State Government to make provision for future passenger rail, but passenger rail is not ARTC's core business and passenger rail is specifically excluded from the EIS.

Accordingly, in the current EIS we have a concept design that has been generally constrained to the Gowrie to Grandchester corridor and running directly through the communities of Helidon, Gatton, Forest Hill and Laidley with rollingstock planned to transport double stacked containers, commodities and coal rather than passengers.

It should be noted that the alignment proposed in the current reference design does extend outside the Gowrie to Grandchester alignment in both Gowrie to Helidon (G2H) and H2C sections. Accordingly, this lends weight to the argument for the dual gauge Inland rail alignments to bypass Gatton and Forest Hill with any future passenger rail able to utilise the existing alignment through the towns.

Flood Panel

As you are aware, the Queensland and Australian Governments have jointly established the *Independent International Panel of Experts for Flood Studies of Inland Rail in Queensland* (the Panel). The Terms of Reference for the Panel provide that the Panel will review the flood modelling for Inland Rail against national/state standards as well as industry best practice.

The Panel has now provided a Draft report on the flood modelling for the Helidon to Calvert (H2C) section of Inland Rail. This report has reviewed the work undertaken by ARTC on the H2C flood models and the reference design developed by ARTC.

In Council's view it is critical that the best possible flood modelling is utilised in design as the flood model will be a key input to setting the Inland Rail horizontal and vertical alignments. If the model is flawed this will lead to poor design and ultimately a railway line that will place communities along the alignment at risk.

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Significantly, for the Lockyer Creek Models Review, the Panel has identified 21 issues they categorise from Low through to Very High Importance. The Panel indicates that the issues “are capable of resolution though this would be through either adjustment to the models developed to date or by modification to the design” (of the railway).

This raises considerable concern for Council in that either the model that has been utilised for the reference design is sub optimal or the ensuing reference design on which the EIS work is based requires change.

Some of the key issues raised by the Panel include that:

- Interaction between local and regional catchments are not effectively represented;
- Further documentation is required to provide confidence in the calibration of the modelling;
- Additional justification is required in relation to flood level increases at Gatton and Forest Hill for extreme events caused by the rail embankment directing more water to the south of the alignment;
- Flood frequency analysis was only performed at one stream gauge;
- Inconsistent approaches were adopted to apply inflows in the hydraulic model.

These are of fundamental concern to Council and we ask that the report and recommendations of the Panel be adopted, and you consider conditioning any approval of the project to address these issues. Further flood related concerns and recommendations are made within Attachment A.

A critical submission we make is that you seek the scope and the duration of the Independent Panel’s work to be extended to cover the duration of project detailed design. Quite a number of the 21 concerns are identified as needing to be addressed prior to detailed design. It is fundamental that a Public Private Partnership entity charged with detailed design has oversight from a credible independent entity. Only that level of oversight will provide confidence in the models and their utilisation in detailed design to effectively mitigate the impacts of flooding.

Consultation

Concerns have been raised about the level of meaningful community engagement that has been achieved throughout the Lockyer Valley. At an ARTC officer level there have been strong efforts made and there is responsiveness and genuine concern for impacted communities. However, it appears that the community engagement at a strategic level for the project has not been successful. There has been a lack of information available at key times leading to poor community engagement outcomes. This has been acknowledged by the CEO of ARTC Inland Rail.

A further concern to Council has been the application of the Multi Criteria Analysis (MCA) by ARTC during concept design. It is understood this tool is used by ARTC to assist in selecting preferred alignments out of a number of alternative concepts. The tool is used to try and quantify options based on a range of criteria with assigned weightings. It is understood criteria utilised include technical viability, safety, operations, constructability, environment and community impacts.

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Concern is raised that respective weightings appeared to heavily emphasise technical aspects with a corresponding small weighting applied to community impacts. Clearly the MCA was not informed by the EIS (which has only now been drafted). Further, there was no community input to these processes although it is understood some community engagement session results were used as a proxy for community impact. While some limited prior community engagement had been undertaken on the alternative options this was far from representative. Accordingly, the utility of such input and of the MCA process is questioned.

Unfortunately, it appears that the MCA process prematurely dismissed alternative alignments around Gatton and Forest Hill with no informed community input.

Council has always recognised the national benefits that can potentially be achieved through Inland Rail. However, national benefits should not come at the cost of Lockyer Valley residents. We invite you and your team to visit the Lockyer Valley as we would welcome the opportunity to show you first-hand the direct impacts a freight train service through the heart of our towns would have.

I trust the information contained in this submission will assist with your evaluation of the project. If you require any additional information or clarification, please contact me or Stephen Hart who is Council's direct contact for this project.

Yours faithfully



Ian Church
CHIEF EXECUTIVE OFFICER

