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Ms Toni Power
Coordinator-General
C/-EIS Project Manager, Inland Rail – Gowrie to Helidon Project
Office of the Coordinator General
PO Box 15517
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Dear Ms Power

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

Thank you for your invitation to Lockyer Valley Regional Council dated 30 July 2021 seeking feedback on the Draft Environmental Impact Statement (EIS) for the Inland Rail Gowrie to Helidon (G2H) 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.

As you will be aware from Council's submission on the Helidon to Calvert (H2C) project, 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 G2H are long held - but the EIS provides for the first time a significant technical submission for Council to consider and assess. Council officers and technical advisors have reviewed the available materials and provide a comprehensive submission (Attachment A). We have also provided below some overarching issues of concern for Council.

It is worth reiterating that with respect to the Lockyer Valley, nowhere else on the entire alignment between Melbourne and Brisbane is a region and its communities so directly impacted by new railway construction and operation, with so little benefit and with such a high frequency of trains.

It is important to note 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.



Context

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

As you will recall from previous correspondence, 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 at Attachment B.

Similarly, you will recall 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 at Attachment C. The Chief Executive and other officers expanded on these concerns at a Senate Hearing in January 2020 (which is available in Hansard). The Report from that Inquiry identifies a range of concerns held by the Committee including concerns about the Project's business case, flood modelling, community impacts and community engagement.

Council has always held serious concerns about the impacts of the 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. Of particular concern is that Council's consultants and officers believe the impacts are significantly understated in the EIS. This is reflected in our detailed submission.

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 in ARTC's view is categorically a freight only railway.

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. Council's review of the EIS raises the concern that not only does inland rail utilise the designated corridor with a project not conducive to passenger rail, but that it may act to 'crowd out' passenger trains through making passenger options more complex or costly.

Flooding

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 G2H section of Inland Rail. This report has reviewed the work undertaken by ARTC on the G2H 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.

For the G2H section three flood models were reviewed by the Panel – Oaky Creek, Six Mile Creek and Lockyer Creek. Significantly, all three models were found to have concerns with issues categorised 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 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 peak flow, flood levels and duration;
- Questionable Flood Impact Objectives;
- Inconsistent approaches were adopted to apply inflows in the hydraulic model.

These are of fundamental concern to Council. There are a range of technical issues that need to be addressed and not left to detailed design. Council requests 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 also 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 Panel's 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

As with previous Inland rail projects, 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.

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 of this railway.

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

