



11 November 2022

Assistant Director – Inland Rail Review Secretariat  
Department of Infrastructure, Transport, Regional Development, Communications and the Arts  
GPO Box 594  
CANBERRA ACT 2601

Dear Sir/Madam

### **Toowoomba Regional Council submission – Independent Review of the delivery of the Inland Rail Program**

Toowoomba Regional Council (Council) is a major stakeholder in the Inland Rail Project, with our region being impacted by two projects, namely:

- NSW/QLD Border to Gowrie (B2G) Project; and
- Gowrie to Helidon (G2H) Project.

Council acknowledges that the Inland Rail Project is a nationally significant and transformational project, delivering critical infrastructure for the local, state and national land transport networks of Australia. Locally, Council recognises that the successful delivery of this project will support the region's growing economy by complementing recently completed infrastructure such as the Toowoomba Second Range Crossing (TSRC) and Toowoomba Wellcamp Airport. Furthermore, the Inland Rail will deliver freight significant opportunities for local businesses located within the Toowoomba Trade Gateway Precinct (formerly the Toowoomba Enterprise Hub), our region holistically and all of southern Queensland.

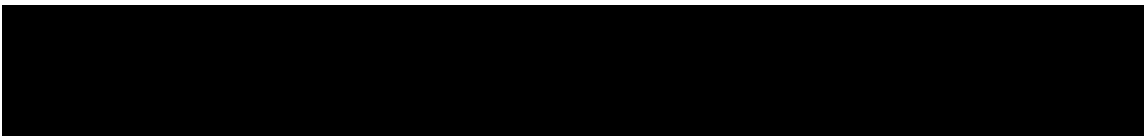
Though Council strongly supports this project, we also recognise the adverse impact on our local communities and specifically the landowners directly impacted by the current rail alignment. Due to this, the Australian Rail Track Corporation (ARTC) must continue their proactive engagement with our affected communities to ensure that all possible measures are taken to mitigate adverse impacts caused from this project and that world-best practice engineering is demonstrated through the whole project, including returned works.

Council notes that there is currently much uncertainty in the community regarding land acquisitions and the impacts on our residents' livelihoods. As such, Council requires that ARTC progress these land acquisition processes with full transparency as the project develops and that all affected landholders are fairly compensated for their losses.

Council also requests that ARTC consider and progress key opportunities and outcomes of regional significance as part of the Inland Rail project, to maximise the immediate and long-term community benefits. This includes ensuring that there are positive impacts to the existing transport network during construction and that improved connectivity that meets our future needs is achieved post completion of the project. Council also requests that any impact on Council assets are minimised, and proposed treatment strategies are developed as requested by Council to ensure the impact on our communities is managed effectively to achieve positive community outcomes.

To support this, Council has previously submitted its Expressions of Interest Submission under the Inland Rail Interface Improvement Program (IIP), detailing a number of key opportunities that will benefit our region. These opportunities need to be revisited by the Federal Government.

The structure of this submission on behalf of Council, is intended to respond to each of the four key themes regarding the management of the Inland Rail project by ARTC and the Federal Government.



**a) ARTC governance and management arrangements for the delivery of the Inland Rail Program.**

While Council acknowledges the increasing budget constraints that the Inland Rail Project is facing, we note that ARTC needs to ensure that appropriate funding is allocated at critical sections of the alignment, including the road-rail interfaces. ARTC needs to recognise and default to Council's governing role as road authority of the local road network, and ensure that the use of normal design domain and the adoption of desirable design parameters as required by Council is achieved. For example, discussions surrounding the Gowrie Junction interface are being hampered by ARTC's adoption of minimum design requirements on multiple elements of this interface and not meeting Council's requirements. While this may be the most cost-effective approach for ARTC, Council wants to ensure that 'desirable design' parameters are adopted, ensuring the safety of road users is prioritised for now and into the future and the legacy infrastructure meets our communities requirements for decades to come.

The community is also concerned that the Inland Rail project is progressing in QLD even though the EIS's have not been approved by the Coordinator General. Part of the concern being the ethical nature of progressing the works prior to this approval step being achieved. There is a general feeling whether perceived or otherwise that the proponent is building Inland Rail no matter what the outcome is. This concern is also shared by our councillors who have been expected to endorse project matters prior to EIS finalisation.

Council is supportive of the Inland Rail Project and has been actively engaging with the Inland Rail team since 2016 and the Melbourne to Brisbane Inland Rail project for many years with the Federal Government. Unfortunately, Council has had no visibility to, nor collaboration from the Queensland Government to date on the Intergovernmental Agreement. Council looks forward to greater collaboration with both the State and Federal Governments to ensure our region receives best project outcomes with positive collaboration between all levels of government and the community. Council requests that the Federal Government encourages the State Government to engage more with ARTC and local governments.

Council acknowledges that ARTC have had an active role in engaging with us as a major stakeholder on the B2G and G2H Projects. While we appreciate this, Council notes that ARTC's 'matrix style' organisational structure has resulted in multiple interfacing points for Council and an overall lack of consistent communication. Council wishes for ARTC to consider possible strategies to harmonise their organisational structure to reduce the amount of touch points between them and Council and ensure consistent messaging.

Council also acknowledges that there appears to be limited interaction between ARTC/Inland Rail teams working on separate components of the program. When aware, Council has often been a bridge between various teams, informing one project team of what progress has been made by the other. Council requests that ARTC ensure appropriate integration between the many ARTC/Inland Rail teams and their consultants and contractors, this would allow for more efficient sharing of resources and information and hopefully provide a better result for the community.

Further to this, Council notes that there has been a lack of structure and notification regarding ARTC's program of works. Being a major stakeholder with the objective of ensuring a best-for-community outcome, Council would appreciate more information from ARTC regarding their prioritisation and program of works so we can be resourced appropriately for any increase in work.

To support our desire to maintain positive relationships between parties in the delivery of the Inland Rail project, Council and the Inland Rail project team have entered into an agreement by which the parties will engage with each other, detailing principles of collaboration, integrity, respect, good faith and timeliness. Council places a high emphasis on the importance of these principles and strongly supports the collaborative nature of engagement required with ARTC, the Federal and State Governments.

**b) The role of Inland Rail in meeting Australia's growing freight task and providing a Service Offering to meet freight sector needs.**

Council is concerned that the decision to terminate the Inland Rail at Acacia Ridge will severely diminish the benefits of this nationally significant infrastructure to all stakeholders. Therefore, to ensure that the Inland Rail becomes the most viable and preferred freight corridor for our region's producers, suppliers and freight operators, Council requests that the final connection between Acacia Ridge and the Port of Brisbane remain a high priority project and for all levels of government to resolve the issues with this final link. Ultimately, Council believes this will be an important connection in delivering overall project outcomes and should be progressed as a separate but fully aligned project, constructed and operational by the opening of the Inland Rail project.

Inland Rail is an important piece of infrastructure which will enable Toowoomba to become a major transport and logistics hub, and the project has wide support across the region from businesses as well as primary producers who are excited about the possibilities of getting their products to market more efficiently. Inland Rail will provide reliable and faster passage of goods from our region to both national and international markets, which will strengthen our local economy and support our agricultural sector, particularly our primary producers. In comparison to the rest of Queensland, Toowoomba currently has a larger percentage of local sales and a smaller percentage of exports nationally. Inland Rail will allow local businesses to export more affordably, rather than being limited to the local market.

Council also acknowledges the positive impacts that the Inland Rail will have on the environment. Rail freight produces six times less CO<sub>2</sub> than trucks, so there are significant benefits to help Australia achieve net zero by 2050, as carbon emissions will be reduced by 750,000 tonnes.

Toowoomba presents a highly attractive destination for logistics use for appropriate market segments. It is anticipated following the completion of Inland Rail that there should be a significant mode shift from road to rail for both eastbound and southbound freight, as well as the opportunity to establish new competitive freight flows from Toowoomba direct to southern markets. There is also an opportunity to capture general freight movements to and from the Port of Brisbane via Inland Rail to central distribution hubs within the Toowoomba region, following the completion of Inland Rail.

In order to effectively maintain the Inland Rail, ARTC will construct a number of Rail Provisioning Facilities along the alignment. Each facility is expected to house approximately 30-40 staff. Millmerran is strategically located between Toowoomba and QLD/NSW border and has the local supply chains, facilities and services to manage a maintenance facility. Council would therefore request ARTC to further consider its proposal, and develop planning for these facilities to be located at Millmerran and other strategic locations within the Toowoomba Region to maximise the economic benefits to the rural townships that are most impacted by the Inland Rail.

In addition to this, Council has been lobbying ARTC for the Inland Rail project network to be capable of operating safe and efficient future passenger rail services without compromising the freight objectives. Council supports the approach and interest to develop future passenger rail terminal locations as noted within Council's Sustainable Transport Strategy (STS) and the need to engage with the State Government during the design development of the project. However, to maximise the regional benefits of Inland Rail, Council is seeking a long-term vision, and further development now to be better prepared to strategically plan for the region's future rail demands and ensure effective connectivity between all modes of transport.

Council acknowledges the importance of the pre-existing rail infrastructure in our region and the importance of this to our community and businesses throughout the region. Having the ability to connect the Inland Rail with current rail infrastructure would greatly improve our current rail network and increase the economic opportunities and positive impacts on our community and the south-western Queensland region.

As discussed with ARTC, there has been opportunities identified to connect the Inland Rail to the existing South Western Rail System near Yelarbon and Southbrook, where the existing system is in close proximity to the proposed Inland Rail alignment. These connections would accommodate heavy agricultural, mining and bulk commodity loads from the south and west, and would reduce the need for road and rail freight loads through the city of Toowoomba. Council again requests that the following additional rail connections should be included and constructed as part of the Inland Rail project:

- Southbrook– to remove the need for rail freight to travel through Toowoomba.
- Yelarbon – to fully accommodate bulk freight from east and west of Yelarbon.

Council acknowledges that the Federal Government has the leading role in determining the broad scope of the Inland Rail project. For this reason, it is of significant importance to Council that the Government seriously considers the benefits that these opportunities would bring to our community. We also believe that some of these opportunities have not been explored in great detail to date, and that the scope of the Inland Rail project, should be broadened to ensure mutually beneficial outcomes between all levels of government for the betterment of all our communities. To maximise the benefits of this project, Federal and State Governments need to invest in associated infrastructure supporting the Inland Rail and intermodal facilities.

Council also acknowledges significant interest from investors in the Toowoomba region, to ensure connection opportunities to the Inland Rail are explored. These opportunities include intermodal developments with the interconnection of B2G with the Toowoomba Wellcamp Airport precinct and InterlinkSQ, who are developing a connection at the interface of the B2G and G2H projects, and where the proposed Inland Rail alignment runs parallel to the existing West Moreton System. Although Council acknowledges the importance of these connections for economic and regional benefit, we also have existing critical community infrastructure (roads and utilities) that will be impacted, which needs significant consideration and improvements, between all parties to ensure satisfactory outcomes. Although ongoing coordination meetings are occurring, Council requires stronger collaboration between parties including Federal and State Governments to again ensure beneficial outcomes for all stakeholders.

**c) The processes for the selection and refinement of the Inland Rail route and whether these processes are fit-for-purpose, including consideration of benefits and impacts.**

Although Council acknowledges the challenges that ARTC have in determining a 'best fit' alignment through complex areas such as Gowrie Junction, we note that there are high impacts to Council's local road network and existing utilities, all of which are critical to the ongoing functioning and future development of our community and their wellbeing. The design horizon adopted by the project of only 10 years on impacted infrastructure is far too short. Although there has been a level of engagement by ARTC to resolve these issues, greater emphasis must be placed on Council's requirements to ensure a best-for-community project outcome and in particular our longer-term planning horizons.

Council resolved in 2016 its support the Inland Rail Project, and the general alignment *through the Toowoomba Region from Inglewood through to the existing Queensland Rail Western Rail Line east of Oakey, then along the Western Rail Line (along the northern boundary of the Toowoomba Enterprise Hub), and then via a tunnel east of Gowrie Junction.*

Council has been consistent in its messaging to our community, that the Inland Rail is a Federal Government project, with the route chosen and entirely managed by the Federal Government through ARTC. Council has limited influence over the Inland Rail alignment or land tenure issues and has not been asked to endorse the route. Council, however, does want to have a positive influence on road-rail interfaces, impacts on other Council assets and broader community impacts in the best interest of the community. We also note that ARTC is responsible for, and will continue to take the lead on, consultation with our community, affected landholders and stakeholders on all matters related to the project.

Council acknowledges community frustration in requests for changes to the alignment where, for example, a change has been made in relation to an agricultural company's operations but no change to areas deemed koala habitat or changes to relocate further away from towns and villages. Property owners are also concerned about being left with "dead land" that can't be gainfully used for agricultural production due to the alignment splitting property.

We also acknowledge that there is a balance of requirements and considerations in determining the final alignment within the study corridor, however we feel that some of Council's key concerns and feedback on behalf of our community, must be more clearly investigated and responded to. Such instances include community concerns at Pampas, Brookstead and Pittsworth in particular.

An example of this would be the proximity of the proposed alignment to Pittsworth, and that moving the alignment further to the north would result in better outcomes for this township and greater community. Council understands that this would resolve some of the noise and vibration concerns though possibly with the need for greater earthworks. This is an example of where Council strongly feels that reconsideration of the alignment is required and further targeted messaging and engagement with Council and the community would be suitable and warranted.

Although we acknowledge that we do not have any power to alter the alignment, the community does have concerns of where the exact alignment is currently proposed, and the impacts on our community. To this end, Council requests that ARTC continue to engage with our organisation, take on board the feedback of our officers and the members of our community, and demonstrate more clearly to Council and the community why the current alignment has been determined.

The reference design indicates that the proposed project will intercept, divert and concentrate upstream overland flows to higher locations in each catchment and may even potentially divert flow between catchments. These changes have the potential to adversely affect TRC road and drainage infrastructure and private property owners.

The proposed Flood Impact Objectives are generally considered to be adequate and are consistent with current industry best practice, however there are concerns relating to changes in peak water level where increases of up to 400mm in localised areas are permitted within the objectives. The assessment of potential consequences of peak water level increases should be assessed on a case-by-case basis. The Panel recommendation for ARTC to undertake an early geomorphological risk-based assessment is prudent and necessary to allow for a robust design of the proposed infrastructure, and associated scour control measures.

The remainder of issues identified in the Flood Panel report are to be addressed as part of the Revised Draft EIS, during detailed design, or through the implementation of a geomorphological assessment. It is considered that this approach is generally adequate however some items such as the sensitivity analysis for blockage and climate change should be addressed as part of the Revised Draft EIS, rather than being deferred to the detailed design phase.

Council will continue to lobby for better outcomes for our community, on matters that impact the final alignment selection, and we require that ARTC continue to engage proactively with Council and our community.

**d) The effectiveness of ARTC's community and stakeholder engagement processes, and opportunities for improvement, including ARTC's approach to addressing community concerns.**

Council acknowledges that ARTC has held many consultation opportunities, however there is feedback from the community that ARTC doesn't "listen" to the concerns raised and that the engagement is often a token effort or tick a box process. The feedback from the community has been that there seems to be very little about the project that is negotiable from an individual or community perspective. Council expects ARTC to undertake genuine consultation with property owners and communities rather than deliver a one-way flow of information.

A great deal of uncertainty was generated in the community with the initial identification of the wider corridor for the rail alignment. Feedback from the community indicated that the lack of details on potential property acquisitions had and continues to have a major impact on property owners' wellbeing. While Council is aware some property owners were and are reluctant to engage with ARTC, it is imperative that timely and genuine engagement continue throughout the project. Council acknowledges that the EIS process has delayed ARTC's ability to provide complete details on acquisitions, we recommend that ARTC collaborate more effectively with the State Government to ensure the EIS process is finalised sooner than later.

Council wishes to acknowledge that there are major flooding concerns shared by our communities in the southern townships of Millmerran, Pampas and Brookstead, in particular the Condamine River Floodplain but also concerns about potential impacts on the Westbrook Creek floodplain and industrial development at Wellcamp.

Although Council is supportive of ARTC's approach of ensuring accuracy through independent professional reviews of the current hydrological model, Council expects ARTC to continue engaging with these communities, groups such as the Millmerran Rail Group, and individual property owners to ensure that historical flood levels are incorporated into the model, as well as local knowledge and concerns. The community has expressed ongoing concerns about ARTC's reluctance to consider local historical knowledge of flood events. Council requests that ongoing communication is transparent and that there is genuine consultation, and that flooding and drainage impacts along the entire route are considered as critically important for our communities and landholders, as well as for our long-term future planning.

Regarding the Independent Flood Panel, the community consultation thus far seems adequate. The Panel's additional in-person consultation with community members on-site proved to be valuable in understanding key concerns raised by the community. This communication line directly with those stakeholders potentially impacted should be continued.

The community has also raised concerns which should be taken into consideration by ARTC. These concerns include but are not limited to:

- Changes to road networks, road-rail interfaces and increased travel times
- Impact on the environment and in particular koala habitats
- Loss of amenity and other social impacts
- The direct impacts on people's mental health
- Impacts to the water table and bores and what that might mean for future agricultural production
- Adjacent landowners who won't get bought out or be compensated but will still be impacted.

Council recognises the balance of earthworks across the alignment and the impact of this on the current proposed alignment, and ultimately the considerations of how ARTC have determined the proposed route within the study corridor. That said, please note the ongoing concerns on behalf of our communities that we have in regard to noise, vibration, lighting impacts and loss of amenity. With particular reference to townships such as Brookstead and Pittsworth, where there is likely to be significant noise, lighting and vibration impacts on those communities, Council requests that reasons for route selection are conveyed and clearly communicated to all affected members of the community.

As stated previously in (a), both Council and the community have received conflicting communications from different areas of ARTC, as it appears that some of these interfacing points are not aware of some issues which are being discussed and/or resolved with the community. Council wishes to reiterate its request for better integration and collaboration within ARTC.

Should you have any queries regarding our submission, or you wish to discuss any other Inland Rail matters, please contact myself directly or Mr Mike Brady, General Manager, Infrastructure Services Group on [REDACTED].

Yours sincerely



Brian Pidgeon  
Chief Executive Officer