

8<sup>th</sup> November 2022

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

Via email: [IR.Review@infrastructure.gov.au](mailto:IR.Review@infrastructure.gov.au)

Dear Secretariat,

The QLGRA (Queensland Local Government Reform Alliance) is the peak body representing resident and community organisations in Queensland. We are a non-partisan and not-for-profit incorporated association.

Community members wish to thank the Government for this opportunity to make a submission to this Review and hope that the information in this submission will be helpful.

Please find our responses to the released Terms of Reference.

We would appreciate the opportunity to appear before the Committee.

We wish the Committee well in its deliberations.



Dr Conny Turni

**President**

The QLGRA is the peak body representing ratepayers and residents promoting the views of all Queensland local communities in all areas of local government regarding improved representation and governance standards

**'Putting Local Communities First'**

## **Submission to the Government's review of the Inland Rail from community members of impacted areas of the Gowrie to Kagaru Inland Rail alignment**

The Calvert to Kagaru section of the Inland Rail, and Gowrie to Kagaru section overall is highly impacted by the proposed Inland Rail and pIS rejected to carry very high numbers of trains. The impacts will be both on communities, farmlands and the natural environment.

### **Key Themes**

#### **1. ARTC governance and management arrangements for the delivery of the Inland Rail Program.**

- *How could ARTC improve its management arrangements and structures to better facilitate the delivery of the Inland Rail Program?*

### **Business Case:**

- The Inland Rail in Queensland, as recommended by the Senate Enquiry, requires a complete review of the 2015 Business Case and, at least, the Queensland section(s) - of what the future needs are, what the alternative solutions are, what is cost effective and eliminates or reduces major community/environmental impacts.
- The original Business Case, which is based on out-of-date assumptions, utilised a 4% discount rate instead of the recommended 7%. At 7% it presents a barely viable BCA of 1.02. The budget blow-out, and the additional unfactored costs of a tunnel from Acacia Ridge to the Port of Brisbane and rapidly changing underlying assumptions (e.g. coal) indicates that the Business Case cannot be considered an accurate current basis for building the Inland Rail and will saddle the country with a tax burden for at least two generations.
- The complete mess over the route of the Inland Rail in Queensland, the lack of an accurate Business Plan, the lack of accurate and complete costing at the commencement, and the lack of identifying major impacts/issues for communities impacted has created a project that has caused years of uncertainty, heartache and disaster for communities, individuals and businesses along the proposed route.
- The changes to substantial underlying facts such as the impact of Coal, the lack of certainty on what goods the trainline will carry, the lack of identified suitable intermodals, the lack of clarity on Port connections (Melbourne, Brisbane and Gladstone), has added to ongoing confusion.
- The Queensland PPP section is completely excluded from the estimated budget, ARTC have refused to release financial information on this section (stating commercial-in-confidence) although Draft EISs for these sections indicate a cost of \$4B+ - the fact that the PPP section is not included in the budget does not mean that the massive cost of this section involving three major tunnels should not be included in the overall consideration.
- The ARTC commitment to the 24-hour Melbourne to Brisbane timeframe has needlessly driven route decisions and discarded sound input from communities – this is despite the ARTC Draft EIS documents for C2K indicating that only 10% of trains at commencement (or 4 train movements) definitely require the 24-hour timeframe and a further 20% (8 train movements) “may” choose this timeframe at extra cost) – see Appendix I for details.
- Community input has largely been almost totally ignored despite years of consultation.
- In addition, the Business Case for location of intermodals in SEQ was only commenced in 2020 with a release date in mid 2023 (largely as a result of the Senate Enquiry) – years and years after the Inland Rail project for SEQ was supposedly finalised – another example of the “cart before the horse”
- Bromelton was only added to the plan in 2017 due to the development of the SCT Terminal and was not part of the original 2015 Business Case.

### **How could ARTC improve its management arrangements and structures?**

As identified in the Senate Review, the project must be founded on a solid and viable Business Plan, therefore the Business Plan must be reviewed in entirety.

- Be flexible to change – ARTC have been dogged in their determination not to review the Business Case despite massive cost increase; have been determined to make minimal changes to the route despite clear issues; and dogged commitment to the 24-hour timeframe despite serious doubts that this can be achieved.

- ARTC appear to be using the demand for 24-hour freight delivery to justify the route selection and huge costs; but from their own table of freight movement for C2K, the 24-hour freight demand component is very small.
- The 24-hour timeframe needs to be re-assessed. Our research (which we can share with you) indicates that it is not achievable especially if goods are brought down by rail from Toowoomba to Acacia Ridge rather than being transported by truck. As pointed out in the recent “Landline” documentary the attachment to this flawed goal means that route changes, protections and mitigations are not being considered whatever the impacts are to community and business of the current route and arrangements.
- The project can only be improved by ensuring that the complete plan is clearly bedded down and fully costed before proceeding further into Queensland and that the impacts on communities and the environment have been properly analysed, avoided, costed and reviewed and changes are made to ensure protection for the future.
- Serious environmental impacts such as on Koalas (now endangered and present through large sections of the Queensland alignment) cannot be written off simply by minor mitigation and offsets – a genuine acknowledgement of environmental impacts would immediately lead to the termination or rerouting of current planned Queensland sections of the Inland Rail including C2K.
- The C2K section should be completely removed – it is a greenfield section, which will completely sever the Flinders- Karawatha Corridor (conservation corridor) in SE Queensland.
- ARTC need to implement stakeholder engagement processes and personnel that are prepared to genuinely engage with stakeholders and the community and initiate change.

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

***How could Inland Rail and access to intermodal terminals create new opportunities and benefits for your region/industry/community?***

- The only benefit to our region will be if Inland Rail DOES NOT proceed (ideally) past Toowoomba, thereby saving the enormous expenditure required for the 3 tunnels and complex construction of the PPP route to Kagaru.
- The C2K section is a greenfield section – there is no existing rail line through the community, farms or natural environment and the impact will be devastating. This C2K section should be completely removed.
- There are no opportunities or benefits to this region except for some minor employment and this is acknowledged by ARTC.
- The C2K section and the Gowrie to Kagaru route overall have the highest or almost higher number of projected train movements of all sections from Melbourne to Brisbane, with the majority of trains from Gowrie to Kagaru originating in Queensland, not from interstate – this huge variation is demonstrated in Appendix II attached.
- It will also have a devastating impact on the Gowrie to Helidon and Lockyer Valley region, as clearly articulated by the Lockyer Valley Mayor and this community.
- Locating intermodals in areas such as Bromelton or Acacia Ridge simply creates massive congestion on local roads and massive impacts on local communities through noise, pollution and disruption in these areas whereas if the final intermodal for SEQ was located at either near Toowoomba localised congestion of major highly developed urban areas and roads would be eliminated.
- Ebenezer offers a poor alternative, given the existing road congestion, proximity to Willowbank settlement, fragmentation of endangered Swamp Tea Tree, Koala habitats and Rosewood Scrub in this area, potential increase to flooding and concerns from the local community regarding shipping or rubbish from southern states to Ipswich mining voids in the region.
- Even though the Bromelton State Development area and Kagaru are on the existing Sydney/Brisbane Standard Gauge line – their location is remote from any “end-destinations” for domestic goods and to the POB –the access is the already highly congested Mt Lindsay Highway. Only now is the section north of the Logan River at Maclean’s Bridge being upgraded to dual-carriageway to meet existing capacity for an area already coping with large new housing developments (e.g. satellite cities of Flagstone and Yarrabilba) and increasing population.

- Both the Bromelton and Kagaru areas are part of the Logan River and Teviot Brook floodplain and therefore susceptible to regular flooding events. In addition, the Kagaru area is part of the catchment draining to Cedar Grove Weir and the proposed water treatment plant which will be part of and provide potable water to the SEQ Water Grid.
- Community impacts have been clearly identified in EIS submissions and Senate Enquiry submissions and include:
  - Noise, vibration and pollution for which minimal if any mitigation is offered in what is generally a very quiet “low noise” environment.
  - A greenfield location with no existing rail infrastructure.
  - Devastating impact on known Environmental Corridors including the Flinders/Peak Crossing Koala movement corridor and the Flinders/ Karawatha Biodiversity Corridor (a conservation corridor and the largest remaining continuous stretch of open eucalypt bushland south of the Brisbane River in SEQ) – recognised for its significant conservation, recreation, cultural heritage and social values and habitat for multiple endangered fauna populations and flora.
- If the rail proceeds into SEQ (past Toowoomba), domestic freight must still be off-loaded from the trains to be transported to final destinations in SEQ and beyond – this means that the figures for removing trucks off the roads may apply to long-haul journeys from Victoria to Queensland **but do not apply** to regional areas such as SEQ where trucks must still transport goods from intermodals to final destinations.
- In addition, Inland Rail will provide little benefit to Queensland farmers as grain and vegetable farmers sending goods to SEQ can transport their goods far quicker and cheaper (generally in 2 hours or less) by truck directly from their farm to final destination than by trucking to a railhead to then be transported by rail at an intermodal, to then be put back on a truck to go to the final destination.

#### What is the solution:

- The trucking industry demonstrated in the Senate Enquiry that domestic goods can be delivered more efficiently and faster if intermodals are located at Gowrie as follows:
- The Inland Rail is proposed to carry very different types of freight as follows (see Appendix I attached re C2K):
  - **Domestic “urgent” freight Express** travelling as quickly as possible from one major city to another for companies such as Woolworths, Coles, Australia Post (many with depots located in the Ipswich/Redbank Plains region) and others in Queensland - this freight is destined for SEQ – this is estimated by 2040 for C2K as 2 arriving trains (4 train movements) of Inland Rail Express.
  - **Domestic freight Superfreighters** which have the “option” to request the express 24-hour timeframe at extra cost – estimated by 2040 at 5-6 arriving trains (11 train movements).
  - **Domestic freight (other) comprising non-urgent goods**, farm produce and supplies and other goods – a small component;
  - **Export goods largely comprising Coal** and possibly some grain (according to the Draft EIS) – these goods are destined for the Ports, either Brisbane or potentially Gladstone. See Appendix Table attached for train breakdown for C2K 2040.
- Domestic Express and Superfreighter freight would be best off-loaded for fastest delivery at an intermodal at Gowrie – input from the trucking industry to the Senate Enquiry demonstrated that freight would reach the “end-points” faster if off-loaded at Gowrie onto trucks and then transported direct to end-destinations.
- The second and poorer alternative for domestic goods would be an intermodal at Ebenezer which would be in close proximity to several of the major depots but would then still involve the slow rail journey and cost of construction of the Gowrie to Helidon/Ebenezer sections and impact on Lockyer Valley.
- For export goods the review of the Gladstone option provides a viable alternative to the Port of Brisbane and would thus avoid transporting Coal and other export goods through SEQ.

- The massive funds saved by not constructing the PPP and upgrading the Bromelton to Acacia Ridge link, and potentially also the tunnel to the POB could be diverted to:
  - Building a major truck-way from Gowrie into SEQ from an intermodal constructed near Gowrie.
  - Contributing to the cost of the link to Gladstone.
  - Upgrading the existing West Moreton Rail-line where needed to facilitate existing and some future transport of goods using this line.

**3. 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.**

*Do you consider ARTC's approach to engaging communities on the route is fit-for-purpose?*

**Response: NO**

- ARTC have failed to engage meaningfully with stakeholders. We have done in-depth analysis of their processes (which we can share with you) which demonstrate that their processes have always been about managing community expectations rather than responding to genuine concern. The second round of EIS preparation has not demonstrated any improvements in this area.
- The approach is a "tick-box" approach where the route has already been determined either by State or Federal Government, impacts are already considered a 'given', and the approach to engagement is largely one of 'presenting information' and making minor amendments to satisfy State Government EIS requirements for consultation where essential.
- With regard to a serious impact such as noise, ARTC is committed to a specific threshold for noise mitigation from Melbourne to Brisbane which does not take into account the varied situations, environments and train volumes.
- Years of 'so-called' community consultation with the Calvert-Kagaru community (including for several as a members of the Community Consultation Committee) has resulted in minimal outcomes of benefit to the community at large and community members now seldom attend consultation meetings as they see no benefit.
- ARTC's own Social Impacts research indicates that nearly 50% of the residents of this section have some kind of identified vulnerability including mental health conditions but there has never been a meaningful response to the fact that these people will be exposed to 24 hour half hourly freight train noise. The most significant response has been to offer counselling, which is meaningless, and even insulting, in the context of the problems that will be added to people's lives by the impact of 24-hour noise.
- Despite years of consultation with regard to natural environmental impact and specifically Koala, no genuine acknowledgement has been forthcoming of the very serious impacts on the natural environment of C2K by Inland Rail, no consideration of relocating the route to protect the natural environment and only attempts to 'mitigate' impacts in ways that are known to have minimal benefit.
- The C2K section of the line severs the Flinders-Karawatha Corridor which is now an extremely important territory for the endangered Koala and many other threatened species. Despite repeated questioning the ARTC refuses to commit to effective mitigations such as fauna fencing, instead pretending that this will be addressed in the "design phase". This has no credibility, as it is obvious that the PPP Regenerate will be seeking cost reduction at this stage and will not commit to expensive but necessary protections.
- For C2K in the first Draft EIS 5 fauna tunnels were offered which proved to be bridges needed for engineering purposes that had no relationship with fauna populations or movement corridors. During further consultation this has expanded to 27 bridges, however, questioning reveals that the bridges are still based on engineering purposes, not koala or other threatened species population needs. ARTC is now engaged in conducting research which is designed to prove post-facto that the predetermined tunnels are effective. This is a potent example of ARTC's ongoing insincere manipulation of information to get the project over the line.
- The ARTC falls back on last resort on providing offsets but these are highly problematic for a territorial species like Koala with specific and localised food tree needs. Transplanted koala are at risk for lack of the correct fodder. THIS IDEA IS CONFUSING AND NEEDS TO BE CLEAR - DO YOU MEAN TRANSLOCATED KOALAS OR TRANSPLANTED KOALA TREES? DO YOU MEAN LACK OF SUITABLE FOOD SOURCE TREES? We submit that the ARTC has decided that dead koalas are the cost of national infrastructure development.

***How could ARTC improve its engagement with communities and stakeholders along the route in regard to the processes used to consider benefits and impacts?***

**Response:**

- ARTC should be required to implement stakeholder engagement processes and personnel that are prepared to genuinely engage with stakeholders and the community and initiate change. There has been constant criticism of ARTC stakeholder consultation through many meetings and through the Senate Enquiry of 2021. There is no sign however that ARTC is either willing or able to significantly change their approach.
- Community engagement cannot be considered an annoying part of the process that simply must be done to meet EIS requirements but seen as having the potential for genuine and valuable input into a major infrastructure project.
- Community Consultation Committee members express frustration and exhaustion with the continued pretence of consultation.
- Engagement should be prepared to genuinely consider alternatives, including major changes and alternatives.
- As long as ARTC is wedded to its predetermined route and determination not to properly mitigate and protect community, fauna and flora, in order to avoid yet more cost blow-out, it is difficult to see them being able to make the shift to genuine consultation. On the scale that ARTC proposes as a measure of consultation they rate at best as “information givers”. They are unable to claim any higher degree of consultation (a detailed analysis of this failure is available on request). While it is clear that the return of the Draft EIS for the C2K section to ARTC for resubmission and further information and community consultation has been largely responsible for a concerted effort to appear more consultative, what this has actually meant is more meetings “empty” of engagement and designed to silence disagreement.
- On every single important issue (e.g. fauna and flora impacts) questioners are referred to the Design phase, as though in this late stage (following finalisation of the EIS) it will be possible to attract the funding necessary to provide the protections needed.
- In addition, however, it is really critical that the information that is being withheld to the “Design Phase” is released to stakeholders in a timely manner to allow that information to be interrogated for the second round the EIS.

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

***What has ARTC done well in engaging with communities, including addressing community concerns?***

**Response:**

- ARTC staff in general have as individuals been attempting to do “their job” and have largely done so in a polite manner but have been constrained by the “brief” they are operating under which has specified a route that “cannot be changed” because it must comply with timeframe constraints and/or has been predetermined by State Government (e.g. Calvert to Kagaru) and mitigation methods (including noise impact criteria) that cannot be varied.

***In what ways could ARTC improve its communication and engagement processes with communities and stakeholders?***

**Response:**

- Please see notes above under ARTC’s approach to engaging communities. No real change will be possible until the project is realistically funded to protect communities and environment.
- In addition, however, it is really critical that the information that is being withheld to the “Design Phase” is released to stakeholders in a timely manner to allow that information to be interrogated for the second round the EIS.

***How could ARTC improve its engagement with communities and stakeholders in responding to concerns?***

**Response:**

- The problem is not really the local project teams, it is the input and instructions they receive from their management above – they are given a route, parameters for mitigation etc, and a budget which they cannot deviate from, therefore they are incapable of making meaningful changes as the project is largely already determined, with only minor changes possible.
- Engagement could only change if there was a preparedness to radically change how impacts on communities and natural environment are considered from a “value” perspective and are included in the overall budget by providing realistic budgets and methods of mitigation and/or rerouting to support this value.
- The project must be realistically funded in a way that it provides a true legacy for future generations and the helicopter view taken to see where impacts are too great to allow the current route to proceed, and for the Government to be prepared to say “no”, it should not go this way, let’s find an alternative.

**Appendix I and II over page:**

Appendix I

ARTC Breakdown of projected train movements for Calvert to Kagaru

Appendix 2

ARTC Map of route from Melbourne to Brisbane showing projected train numbers per section

## Appendix I:

The following tables are extracted from the ARTC Draft EIS (2020) for Calvert to Kagaru submitted to the Queensland State Government.

This demonstrates the very high number of projected train numbers on this section and that the very high percentage of trains are Queensland originating destined for Export.

The daily train movements detailed in **Table 21** for project opening in year 2026.

**Table 21 Daily train movements on the Project (year 2026)**

Train service	Train movements		
	Daytime	Night-time	Total 24-hour period
<b>Year 2026 project commencement</b>			
Inland Rail Express	2	2	4
Inland Rail Superfreighter	5	3	8
Toowoomba Export Container freight	1	0	1
Narrabri Export Container freight	1	1	2
Queensland grain, Narrabri to Fisherman Island	1	1	2
Queensland cotton	0	1	1
Queensland grain services	4	1	5
SEQ Livestock	1	1	2
Coal services (including 1 from Rosewood)	7	9	16
Ebenezer IMEX (from Rosewood)	1	0	1
<b>Daily totals year 2026 project commencement</b>	<b>23</b>	<b>19</b>	<b>42</b>

Note Daytime is 7.00 am to 10.00 pm and night-time is 10.00 pm to 7.00 am.

**Table 22 Daily train movements on the Project (year 2040)**

Train service	Train movements		
	Daytime	Night-time	Total 24-hour period
<b>Year 2040 project commencement</b>			
Inland Rail Express	2	2	4
Inland Rail Superfreighter	8	3	11
Toowoomba Export Container freight	1	0	1
Narrabri Export Container freight	1	1	2
Queensland grain, Narrabri to Fisherman Island	1	1	2
Queensland cotton	0	1	1
Queensland grain services	5	1	6
SEQ Livestock	1	1	2
Coal services (including 1 from Rosewood)	9	12	21
Ebenezer IMEX (from Rosewood)	1	0	1
<b>Daily totals year 2040</b>	<b>29</b>	<b>22</b>	<b>51</b>

Note Daytime is 7.00 am to 10.00 pm and night-time is 10.00 pm to 7.00 am.



## Appendix II:

Extract from Inland Rail Business Case Briefing Paper No 3 | August 2020 page 7.

This map shows the huge increase in trains from Oakey to Kagaru vs Inglewood to Oakey demonstrating that Queensland has much higher train movements that any other sections of the Inland Rail.

### Appendix 1 Expected train movements per day – 2015, 2025 and 2040

