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## **Submission to Inland Rail Inquiry and Review 2022**

### **1.0 Background**

The ARTC Inland Rail project is proposed as a standard gauge 1,710 km long alignment from Melbourne to Acacia Ridge and Bromelton Brisbane. This submission relates to the section from the NSW/Qld border to Gowrie and includes the Kagaru to Acacia Ridge/Bromelton (K2ARB) section.

This submission is focussed on an alternative proposal for the Inland Rail section from the NSW/Qld border to Gowrie which has the potential to:

- Overcome flooding problems in the Inner Downs border to Gowrie section
- Remove the need for a PPP and range tunnelling by not constructing the Inland Rail between Gowrie to Acacia Ridge/Bromelton Brisbane
- Make Logan and Brisbane coal free cities

This submission does not detail the many problems associated with the Inland Rail travelling through densely populated suburbs from Kagaru to Acacia ridge nor does it detail the many inadequacies of Acacia Ridge as a termination point for the Inland Rail as these details are covered in other submissions.

### **2.0 Submission Author**

This submission is being made by Stan Corbett Project Engineer (retired) and on behalf of the K2ARB Inland Rail Action Group (IRAG).

### **3.0 Aims of the K2ARB IRAG Group**

The IRAG group acts as representatives for residents residing between Kagaru to Acacia Ridge currently comprising 50,000 residents living in close proximity of the rail corridor with future potential 230,000 residents.

The K2ARB IRAG group is not opposed to the concept of an East Coast high speed inland freight rail line between Victoria, NSW and Queensland however we are opposed to the current proposal to route these trains from Toowoomba to Brisbane and consider this section of the route unnecessary with adequate road transport being available using the new second range crossing, the Toowoomba bypass..

The route proposed through inland Victoria and inland NSW services these states and we propose that the inland rail is also designed to service inland Queensland, not as per the current proposal for termination in the SE corner of Queensland with no provision to provide commercial utilisation for the rest of the Queensland state.

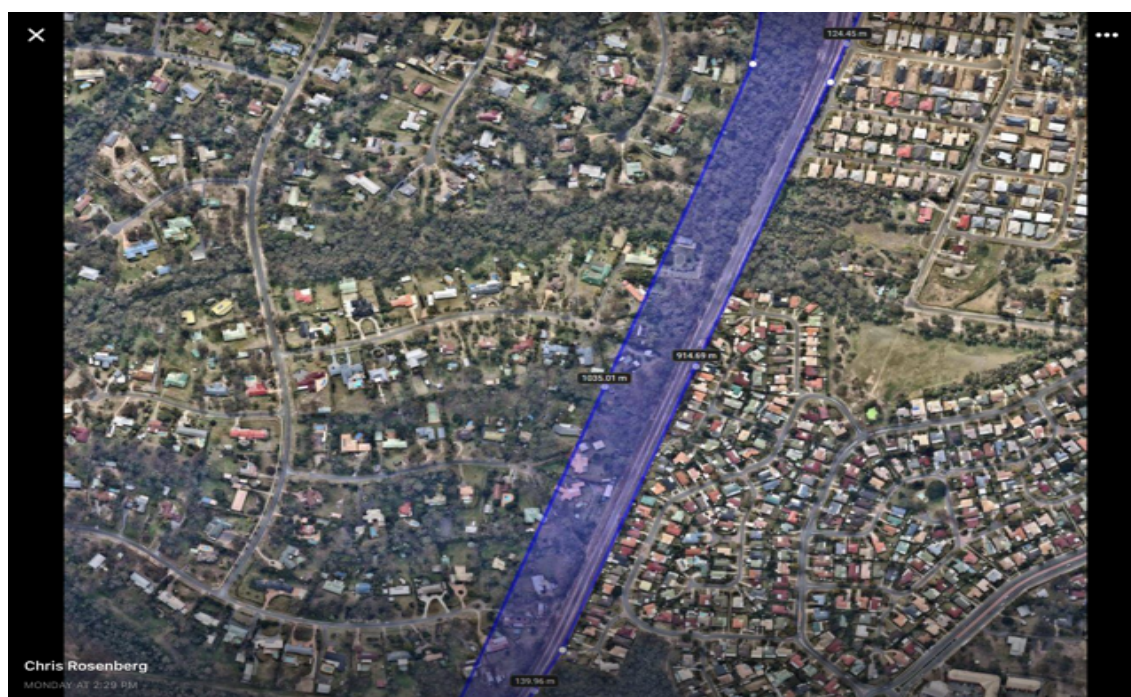
### **4.0 Summary of the existing ARTC proposal**

The route from Toowoomba to Brisbane requires the construction of approximately 8.5 kms of tunnels through several mountain ranges at a cost estimated to be six billion dollars.

The ARTC proposal includes for initially 1.8km long trains eventually extending to 3.6km long trains. Approximately 40% of each freight train could be double stacked container cargo. Double stacked wagons will be 7.1m high.

Currently there is a daily peak of 8 trains per day on the existing NSW/Qld east coast freight and passenger railway line between Sydney and Brisbane. If Inland Rail proceeds the frequency of trains will rise to 45 per day by 2040 including a mix of initially 120 rising to 240 Queensland narrow gauge coal trains per week. (based on the business case). These coal trains will not be terminating at Acacia Ridge but continue through to the Port of Brisbane as currently occurs by the coal trains utilising the West Moreton railway line passing through Ipswich and onto the Cleveland line.

The proposed route from Kagaru to Acacia Ridge passes through high density populated suburban residential areas including suburbs such as Greater Flagstone which will exceed 130,000 residents.



Existing residential suburbs Hillcrest and Forestdale.

ARTC have planned passing loops within the suburban corridor at high density residential suburb locations with no consideration of the impact idling trains will have on adjacent residents. The noise impact of 1.8 to 3.6 km long trains stopping and accelerating from rest has also not been considered.

With no environmental impact statement (EIS) granted for the K2ARB Inland Rail line section the health issues and social impacts for thousands of residents along the route including coal dust, rail dust, noise, vibration, visual pollution and stress, interrupted sleep and factors including local traffic impact of short haul trucks from Acacia Ridge and Bromelton are unknown.

## 5.0 Inland Rail will be of no benefit to Queensland Inner Downs Farmers

A statement of time and cost as related by an Inner Downs farmer in the Pittsworth area.

## 5.1 Main Agricultural products

*The 3 predominant primary industries on the Downs are:*

- 1 Grain*
- 2 Cotton*
- 3 Beef Cattle.*

*The distance from the Downs to Brisbane varies slightly on location - Dalby is 200 km, Brookstead is 180 km, Warwick is 160 km. The first important factor of road freight is the fact that the transit time from the Downs, in general, is about 2.5 hours and this has been reduced by up to 20 minutes following the Toowoomba bypass as opened in September 2019.*

*The fundamental fact is that road freight semi-trailers will load ON FARM at the place of despatch and will deliver direct to the DELIVERY POINT. This freight process eliminates "double handling"- the vehicle completes the whole task from point A to point B. Logistics for agricultural product freighting is about moving freight from point of origin to point of delivery in the most effective time with the minimum of cost. The shorter the distance, the more appropriate it is to use road freight.*

*A simple case study, A farmer at Brookstead sells a load of wheat ex his farm to a stock feed mill in Brisbane . The miller requires delivery by the next day. The farmer rings his local carrier, tells the carrier what is required, and they arrange a loading time, say 8 am the next day. The next day, the truck arrives at 8 am and loads the vehicle out of the farmers silo by auger. Load time is usually 1 hour - depending on the size of the load and the size of the auger. The truck driver completes loading and drives off to the nearest weighbridge. After the load is weighed, he leaves for Brisbane and arrives in approximately 2.5 hours time. The driver weighs the load at the closest weighbridge and proceeds to the feed mill and unloads. The whole operation is completed from farm to mill in less than 4 hours - including loading. Cost to farmer = \$25.00 per tonne*

*Rail freight simply CANNOT offer this type of service . The farmer would have to take his grain to the closest Graincorp silo in his own truck, have the grain tested for insects, weighed, and unloaded into the grain terminal. This grain would have to wait at the silo until a train load is accumulated with other end users as well as his product was made up to a standard mass for a train cargo. This could take weeks. The train would then travel to Brisbane to a grain receival depot (probably the port). Transit time -1 day.*

*The end point miller would then have to arrange a carrier to deliver the grain from the depot to his feed mill. Obviously the total freight cost (2 trucks and 1 train) would be much more than by road which would take but a fraction of time as by rail/road.*

## 5.2 Other Agricultural Products.

*COTTON: There are 2 Gins near Dalby and 1 near Cecil Plains. None have adjacent rail facilities. Once cotton is ginned, it is baled for transport in taut liners. It could be placed in shipping containers, and this may happen more in the future. Again, the logistics of loading on truck at the gin and delivering direct to port for export orto a cotton mill will always*

*preclude double handling and time constraints by rail.*

*BEEF CATTLE: QR does not transport cattle by rail anymore. Any existing cattle trucking yards at QR stations have been dismantled simply because rail freight could not compete with the efficiencies and logistics of road. Livestock cannot be just loaded on rail wagons and be subjected to journeys without being checked constantly. Road stock transport operators standard practice is for the cattle to be checked by the driver every 2 hours. Rail freight of livestock cannot provide or compete with this service. Cattle can be loaded at the graziers yards on cattle crates and carted to destination direct.*

*Most cattle from Downs grazing properties are consigned to sale yards on the Downs (Toowoomba, Dalby, Warwick), to abattoirs on the Downs (Beef City, Oakey), or to abattoirs in the Brisbane metropolitan area (Dinmore, Beenleigh). These Brisbane abattoirs are not supplied by an existing rail service and Inland Rail is NOT proposing to provide a rail service to these abattoirs.*

*As with grain and cotton, cattle road transport can load and deliver to Brisbane and Beenleigh works from the Downs in 3 hours.*

### 5.3 Advances in Road Transport

*It also needs to be considered that road transport has progressed remarkably in the last 20 to 30 years as roads have been upgraded and prime movers have increased in size and power. 400 HP engines are common place in many prime movers for heavy road transporters. This has led to single semi-trailers being superseded by B-Double and road train combinations which are legally able to travel within designated routes within Brisbane. The extra load carrying capacity has allowed for increased ability to shift large tonnages with reduced transit times and improved efficiency.*

### 5.4 Viability of rail transport over distances less than 350 km

Various studies such as the Bureau of Infrastructure, Transport and Regional Economies Research Report 139, "Why short haul intermodal services succeed" have shown that rail freight only becomes viable for distances which exceed 350 kms.

Discussions with local farmers in the Pittsworth area verified that many farmers have invested in expensive produce storage infrastructure, some have included their own trucking fleets. Assuming that Toowoomba would be used as a staging point for Inland Trains to Brisbane the cost of trucking product to Toowoomba, unload and reload onto a container wagon, rail to Acacia Ridge or Bromelton, unload and reload onto a local shorthaul truck for unloading at the final destination cannot compare to the trucking system currently in use. A truck loaded at the farm gate for an estimated \$25.00 per tonne transported to the final destination in Brisbane in under 3 hours and unloaded at the final destination is by far the most time and cost efficient method when compared to the Inland Rail option.

Under the current ARTC Inland rail proposal of terminating the project at Acacia Ridge and Bromelton the evidence of studies and verification from Queensland farmers indicates that this project will be of negligible value to Queensland from the NSW/Qld border to Brisbane for agriculture product transportation.

The alternative route and termination at Dalby as proposed does however provide the

future alternative of exceeding the rail route length past the 350 kms distance particularly with the proposal to construct the Surat basin Railway for carriage of both Minerals, coal and agricultural products to the port of Gladstone for regional use and export.

It would be expected that users of the Surat Basin Railway would include agricultural producers in the Wide Bay and Fitzroy regions.

## **6.0 Issues identified by IRAG with the ARTC Kagaru to Acacia Ridge preferred Route**

### **6.1 Route Selection:**

The route from Toowoomba to Acacia Ridge utilising the existing NSW/Qld freight line is flawed. The section of the rail corridor from Kagaru to Acacia Ridge is part of the massive Logan area residential development and extensive trackside development has been allowed by LCC council and the State PDA areas. The Greater Flagstone State PDA with a potential population of 130,000 residents is an example of poor planning.

### **6.2 Acacia Ridge Terminal**

The proposed Termination point for Inland Rail of Acacia Ridge has not been fully studied for suitability including accommodating train lengths, frequency of trains and traffic studies regarding the potential daily thousands of short haul trucks distributing containers from this terminal without adequate local haulage roads.

### **6.3 Submission Focus on the Alternative Route and Dalby Termination**

The K2ARB route and its associated problems including the unsuitability of Acacia Ridge as a termination point for Inland Rail are adequately covered in other submissions and are not fully detailed in this submission.

## **7.0 Border to Gowrie Route Comparison - ARTC preferred route selection and Alternate Route selection**

### **7.1 ARTC Selected Route**

Below is the ARTC map showing the preferred Inland Route as selected.

**Submission for the Senate Inquiry into the Management of the Inland rail Project by the Australian Rail Track Corporation and the Commonwealth Government**



The ARTC chosen route — shown in the map above as the purple line — is similar to the alignment known as the "base case" proposed by the Australian Rail and Track Corporation (ARTC) in 2010, but deviates east after the Condamine floodplain to go via Pittsworth, Brookstead and the Wellcamp-Charlton Industrial Precinct.

The route chosen by the ARTC team between the NSW/Qld border and Gowrie requires further investigation into suitability. There is another option proposed by local residents which travels west of Millmerran and is the current preferred route. This alternative route passes through cypress pine forests and overcomes many of the current difficulties now being realised by ARTC as they proceed with their preliminary engineering studies.

The current ARTC preferred route NSW border to Gowrie passes over heavy black soil similar to the Condamine floodplain and years of local experience has shown that building in these soil conditions is extremely difficult.

In addition the current preferred route runs parallel with the A39 highway and cuts through many farm properties and bisects numerous minor and major roads which ARTC are only just realising with their preliminary engineering the potential high cost of diverting these roads over or under the inland rail line.

The current ARTC proposed route has the potential for thousands of people to have

their lives disrupted both economically and socially, with ongoing discomfort for decades to come from noise, vibrations, potential flood height rises, flood wash issues and numerous dangerous small crossings required to access hundreds of small properties in this heavily populated area.

Toowoomba Regional Council has stated that this as a key population growth area, the current route is going to restrict development at Pittsworth as it will be unfeasible to have parts of the town developed on the northern side of the railway line.

## **7.2 Alternate proposed route.**

Dalby is north of Inglewood. The selected ARTC Inland Rail line is proposed to be built from Yelarbon through the Whetstone Forestry to run just west of Inglewood. This is the route shown in purple that Inland Rail is proposed to follow. It has been proposed by Goondiwindi Regional Council that the route should be aligned from Inglewood slightly further west ( but in a northerly direction) towards Millmerran through the Bringalily State forest. This route has also been endorsed and supported by various politicians. This forestry area is state owned and the soil type is Rudosols and sand - perfect for railway construction and infinitely preferable to the Sodosols soil that the ARTC plan to traverse south of Millmerran - through farmland.

The alternate route as proposed by IRAG between Inglewood to Dalby for the alternate rail line route runs from Inglewood through the Bringalily forest country, to the west of Millmerran and continues northward through the Western Creek State forest to pass Cecil Plains to the west of the town potentially servicing the cotton gin located there.

North of this point the alternate route would pass through forest country and continue for another 15 km to the northern edge of the forest country.

From this point the alternate route would follow Nandi Road through farmland for 15 km northward to the Moonie Highway. The line would then cross over the highway and then immediately join on to the QR Glenmorgan Line for the last 10 km into Dalby.

The approximate distance from Inglewood to Dalby is 150 km, of which 15 km is farmland, 10 km follows a brownfield QR alignment, and the remaining 125 km is through cyprus pine forestry .

## **7.3 Advantages of Dalby as a transit centre**

There is adequate flood free- land available near Dalby for an Intermodal terminal for use as a transit centre. Dalby also has 2 major grain storage Graincorp silo complexes (both on rail) and there are 2 cotton gins there as well.

Dalby is on the QR Western line from Toowoomba to Charleville.

## **7.4 Connection to Gladstone**

To complete the Gladstone connection, the existing line west to Miles (110 km) from Dalby would have to be upgraded to dual gauge. From Miles, a new line would have to be built northward from Miles through to Banana and then continue as the Surat Basin rail line to Banana and onto Gladstone.



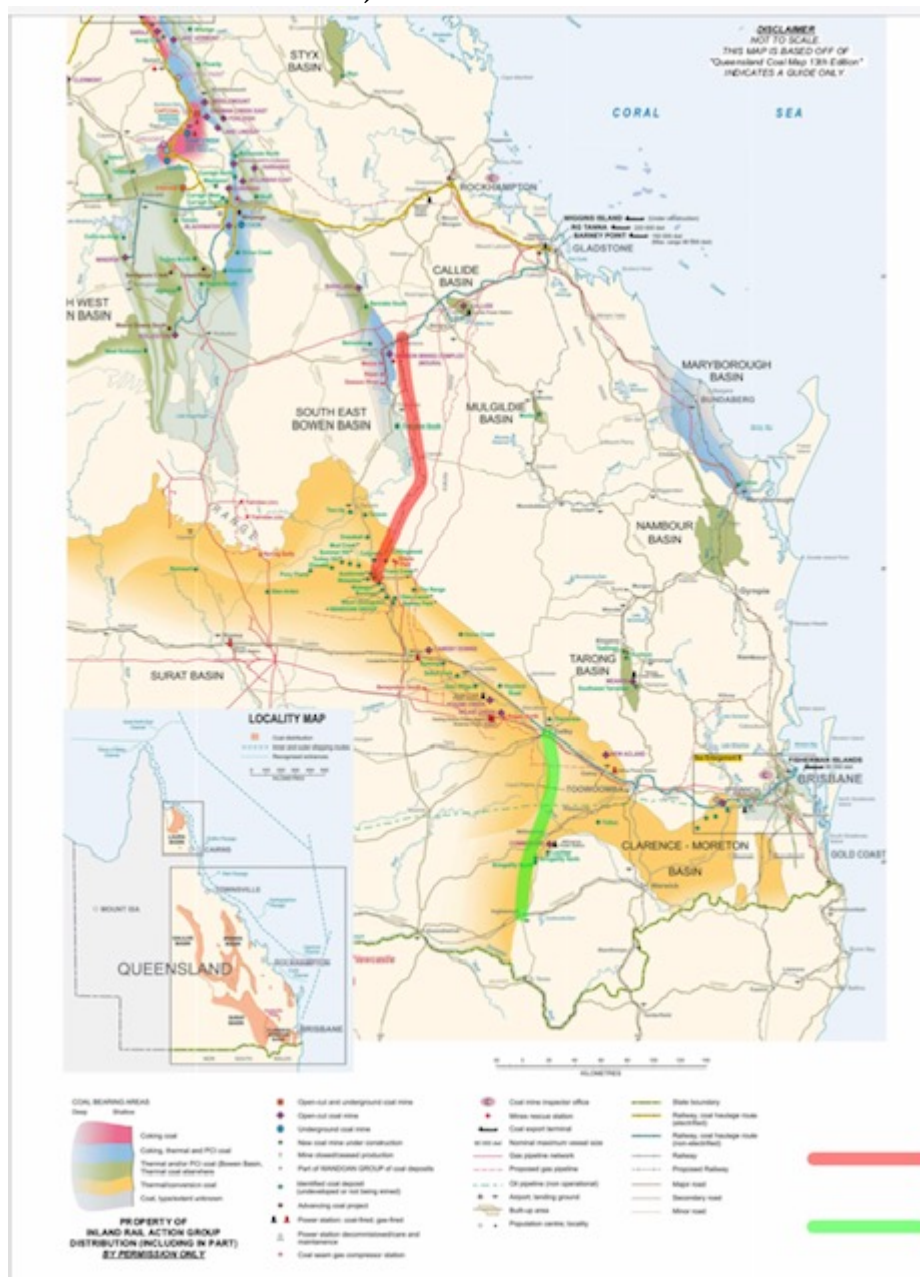
## 7.5 Alternate Inland Rail route map

The alternate route shown on the map below is a feasible alternate route which provides superior soil conditions for heavy duty railway construction, would inconvenience far fewer people, utilises government owned land and is far more socially, environmentally and economically acceptable.

The proposed alternate route is shown in green highlight on the map and extends from Inglewood to Dalby bypassing many of the problems discussed by local residents with ARTC when considering the ARTC selected route.

Green – Proposed alternate route from Inglewood to Dalby

Red – Complete the approved 210km Surat Basin railway (within the Surat Basin Infrastructure Corridor SDA)



The alternate route has been described as ‘hard red country with exposed sandstone in the waterways’.

## **8.0 Details of the K2ARB IRAG proposed Alternative**

An alternate route from Inglewood to Dalby is proposed. The alternate route in addition to a new route selection would include the following major design and construct components:

### **8.1 Dalby Intermodal Terminal**

ARTC to construct an Intermodal Terminal at Dalby designed specifically for the Inland Rail freight railway capable of handling double stacked 1.8km long trains initially with provision for future proofing for 3.6km long double stacked trains when and as required.

The Dalby intermodal terminal would serve as a point of extension of the Inland rail in the future to service inland Queensland possibly through to Cairns

The Inland Rail under the current project scope is to terminate at this new Dalby Terminal with all coal trains proceeding to the Port of Gladstone coal export terminals and freight trains with goods for the Gladstone area.

### **8.2 Construction of the Surat basin Railway**

The Inland Rail project as part of the alternate proposal is to complete the approved 210km Surat Basin railway (within the Surat Basin Infrastructure Corridor State Development Area) as a dual gauge railway connecting Wandoan (230km north-west of Toowoomba) to the Moura Railway system near Banana.

The southern rail link project has been feasibility engineered and passed a three year EIS study. The Southern Link Railway will provide access for the transport of coal and freight goods to the Port of Gladstone via the QR National’s Moura line to Wiggins Island and RG Tanner export terminals located to the north of Gladstone city and Gladstone shipping export terminals.

This new rail link will assist in removing trucks off the Bruce Highway between Brisbane and Gladstone and in the future between Brisbane and Cairns.

The southern rail link is costed at 1billion dollars (2010 estimate), a potential significant saving of taxpayer dollars to the ARTC current proposal of constructing the Gowrie to Acacia Ridge section of the Inland rail currently costed at \$6 Billion dollars.

The completion of the missing southern link railway will provide many benefits to inland Queensland including the following as quoted from the Surat basin Southern Link Study documents: Refer to Reference Link (2)

*‘This rail link to the Port of Gladstone also has significant advantages for the transport of general freight. Regional freight services currently rely on the Western Rail Line and the Port of Brisbane. Current demands on this export route mean that, although it provides export opportunities for grain and livestock, the freight service is generally of a low standard. Completion of the Surat Basin Rail Project will provide a new rail freight link that can utilise the Port of Gladstone, alleviating capacity constraints on the Port of Brisbane and Western Rail line, and greatly enhance the*

*export options for regional producers.*

*Adding to this enhanced freight service is the potential for the Project to provide wider, national benefits. The Surat Basin Rail has the potential to form part of the proposed Australian Inland Rail Expressway; a project of national significance that is intended to ultimately link Melbourne and Darwin via New South Wales and Queensland. This provides opportunities to other potential users, along the Eastern seaboard, including mineral, agricultural produce and general freight customers to gain access to an economically competitive freight service.'*

In addition, the Surat basin Southern Link will allow multi configurations of trains including future electrification as per the following:

*'In light of this potential dual use for the Project and as specified in the Terms of Reference the proposed line can accommodate a number of operational scenarios. These are:*

*Narrow gauge coal railway;*

*Narrow gauge coal/freight railway; or*

*Dual gauge coal/freight railway.'*

### 8.3 Additional Alternative Proposal Items to be Considered

- a) *Under the alternate proposal ARTC as part of the Inland Rail scope of work for design and construction shall include the upgrade and enhancement of the complete rail system from the NSW/Qld border to Gladstone as a dual gauge railway designed for the speeds and axle loads proposed by ARTC for the Inland Rail.*
- b) *ARTC in their published documentation have state that 70% of containerised freight from Melbourne will be Brisbane domestic freight. A percentage of this domestic freight will be intended for Toowoomba and places west and North including Gladstone and Dalby will serve as a distribution site for this freight avoiding trucking of goods from Acacia Ridge and Bromelton up the range in the case of western destination goods. Final distribution of goods for Brisbane and coastal cities and towns north and south where goods are intended for local distribution centres will be by shorthaul trucks from the Inland Rail trains at Dalby Intermodal Terminal.*
- c) *Domestic goods distribution from Dalby for delivery to Brisbane will have a number of alternatives for the final destination to Brisbane and other supply distribution depots:*

## 8.4 Freight Distribution routes available from the Dalby Intermodal Terminal

### **\$1.6 billion Toowoomba Second Range Crossing open**



The TSRC is a 41km-long bypass route to the north of Toowoomba, including an 800m-long viaduct, which will make transportation more efficient.

- 1) The choice of two range crossings providing truck access roads to Brisbane and coastal areas.**
- 2) By container train to Acacia Ridge via the recently enhanced thirteen tunnels on the existing rail line to Brisbane.**
- 3) By container train using the existing NSW/Qld freight line to Acacia Ridge and Bromelton intermodal depots**

4) It should be noted that the proposed alternative Inland Rail route terminating at Dalby in no way impacts on the existing NSW/Qld rail corridor and this rail corridor will remain accessible to freight and passenger services into the future

5) It should also be noted that the proposed alternative Inland rail route terminating at Dalby relieves the impact of heavy rail freight traffic on the existing NSW/Qld rail corridor and provides a future upgrade of this corridor for the Salisbury to Beaudesert passenger rail by the State Government.

## **8.5 Current Coal Train Route**

Currently bulk coal is conveyed by Qld narrow gauge coal trains from the Surat basin coal mines via the range crossing and Ipswich through many high density Brisbane suburbs to the Port of Brisbane. Export tonnages for coal from this port are currently around 8 MTPA. It is proposed by ARTC in the business case document that this export tonnage is to be doubled to 19 million tonnes per annum. The alternative rail route and termination of the current Inland Rail at Dalby allows the current and future export coal from the Surat Basin to be sent via the new Surat basin rail link for export by the Port of Gladstone at the coal export terminals of Wiggins Island and RG Tanner.

## **9.0 The benefits of the IRAG alternative route and Dalby Termination:**

1. The concerns expressed by many Brisbane community groups living in densely populated inner Brisbane suburbs from Ipswich to the Port of Brisbane regarding social, economic and the dangers to their health from exposure to coal dust will be removed with all coal trains travelling to the Port of Gladstone.
2. The concerns expressed by community groups living from Kagaru to Acacia Ridge with respect to freight trains and the economic, social and health problems associated with dust from open coal trains travelling through densely populated Logan and Brisbane suburbs will be removed.
3. The proposed alternative overcomes obvious problems with the privately owned

**Acacia Ridge intermodal terminal and marshalling yards and the lack of infrastructure roads surrounding this facility and Acacia Ridge for cargo distribution truck movement of shorthaul trucks potentially numbering 5,000 per day.**

- 4. The concerns of land owners including private property residential owners, farmers and livestock owners from the NSW border to Gowrie and from Gowrie to Acacia Ridge with regard to land resumptions, flooding and train traffic passing over their land will be removed.**
- 5. Design problems associated with passage over floodplains including unknown expenditure to overcome unknown final design and construction solutions and increased expenditure will be removed.**
- 6. Design problems associated with the required range tunnels associated with the range crossings including unknown expenditure to overcome unknown final design and construction solutions, gradients within the tunnels outside of engineering standards, increased transit times due to steeper climbs within tunnels and other associated technical problems will be removed.**
- 7. The PPP financing package will not be required. The taxpayer financing of the Gowrie to Kagaru section of the Inland Rail with its associated approximately 8.5kms of tunnels costed at \$6 billion dollars will not be required and this federally funded money will be available for the scope of the alternative route proposed and the construction of the Surat basin railway currently estimated in the preliminary engineering document as \$1 billion dollars (2010 estimate).**
- 8. The alternative route and Dalby termination provides a freight road connection at Toowoomba to a local international airport for overseas and interstate export.**
- 9. The completion of the missing southern link railway will provide many benefits to inland Queensland by connecting many agricultural facilities including the link to the Queensland owned Port of Gladstone for the export of minerals, coal and agricultural goods.**

## **10.0 Conclusion**

**The proposed alternative described above, as well as providing many advantages to Brisbane and Logan cities by becoming coal free cities and removing the movement of open coal wagons and heavy freight trains through densely populated suburbs with associated health issues also fulfils the agenda of the ARTC Inland Rail service offering.**

**The IRAG alternative described complies with the ARTC Inland Rail objective for the provision of a new rail freight connection between Melbourne and Brisbane by utilising existing road and rail connections between Dalby/Toowoomba and Brisbane Acacia Ridge and Brisbane goods distribution centres. In addition, the existing rail link connection to the**

**Port of Brisbane is retained for export containers transported via the current road and rail links as required.**

**The cost of the proposed route and termination at Dalby alternative to taxpayers will be considerably less than the combined federally allocated funds and PPP for the current Inland Rail scope of work from Gowrie to Kagaru and from Kagaru to Acacia Ridge and Bromelton . The future income to the Queensland state from export cargo royalties in addition to the wealth generated from a Queensland owned port should by itself provide a reason to seriously consider this alternative proposal.**

### **Reference Links**

- (1) [Salisbury to Beaudesert\(External link\)](#)
  
- (2) [www.statedevelopment.qld.gov.au/coordinator-general/assessments-and-approvals/coordinated-projects/completed-projects/surat-basin-rail-project.html](http://www.statedevelopment.qld.gov.au/coordinator-general/assessments-and-approvals/coordinated-projects/completed-projects/surat-basin-rail-project.html)