

Name of Project: [Inland Rail – Border to Gowrie \(B2G\) project – draft environmental impact statement](#)



Signature:

Date:

Section of the EIS considered

This submission addresses shortcomings in Appendix C of the draft EIS on Stakeholder Engagement, specifically the process in Appendix C, Section 2.1 and Section 2.5, Figure 2.1, as well as an incomplete list of Community groups in Table 2.2.

We claim that the draft EIS submitted by ARTC does not comply with the Terms of Reference (TOR) set out by the Coordinator-General on 16 November 2018, which set out the matters the proponent must address in an EIS for the project and are approved by the Coordinator-General under Section 30 of the State Development and Public Works Organisation Act.

Specifically, the draft EIS does not provide evidence for the following requirements of the EIS TOR around Stakeholder Engagement:

- 7.7 An appropriate public consultation program is essential to the impact assessment process. To ensure appropriate consideration of cross-border impacts, the proponent should consult with all relevant local and State (including New South Wales) and Commonwealth government agencies, and potentially affected landowners and local communities.*
- 7.8. The EIS should describe the consultation that has taken place and how the responses from the community and agencies have been incorporated into the design and outcomes of the project.*
- 7.9. Include, as an appendix, a public consultation report detailing how the public consultation plan was implemented and the results of the implementation.*

This submission also addresses shortcomings in Chapter 15 of the EIS on Social impact, and Appendix U on Social Impact assessment.

The Social Impact Assessment should address the following criteria as specified in the Terms of Reference (TOR) set out by the Coordinator-General on 16 November 2018.

11.139. Prepare a social impact assessment (SIA) for the project consistent with the relevant requirements in the Coordinator-General's Social impact assessment guideline March 2018 (refer to Appendix 1).

11.140. The SIA is to be developed in consultation with the Coordinated Project Delivery Division in the Office of the Coordinator-General, Department of State Development, Manufacturing, Infrastructure and Planning. The SIA is to describe the potential social impacts (both positive and negative) of the project, and must identify relevant and effective impact mitigation and benefit enhancement measures.

11.21 (d) identification of affected parties and communities that may be affected and a description of the views of those parties and communities

Description of the issue

The Pampas Rural Neighbourhood Watch Committee is a strong and active local committee that represents the neighbourhood interests of the rural community in Pampas. The Committee meets regularly at the Pampas Memorial Hall and has a close liaison with local Police officers, primarily Sergeant Steve Ryan (now retired), to ensure the regulation, safety and well-being of the Pampas community.

Chapter 15 of the draft EIS states

Communities identify with the region's rural qualities, its relaxed country lifestyle, and the safe and family friendly environment. Many of the rural communities and townships are self-contained and enjoy strong community connections and cohesion (TRC, 2014b and 2012).

One major concern with the EIS document and the community consultation program is that the Pampas Rural Neighbourhood Watch Committee has not been approached by ARTC or consulted with in any way, and we note that we are not listed as an Impacted Community Group within our community (Appendix C, Table 2.2)

1. The draft EIS Social Impact Assessment states that SIA engagement is inclusive of all interested stakeholders (Chapter 15, Table 15.3). The omission of the Pampas Neighbourhood Watch group contravenes this claim.
2. Section 15.6.8.4 of Chapter 15 Social, is of particular relevance to the Pampas Neighbourhood Watch group. The SIA states that *rates of crime in all three SA2s were well below the rate for Queensland*. The Pampas Neighbourhood Watch group has already noted increased activity around assessment and planning phases including ARTC and contractors within the local community.
 - There have been instances of trespass where contractors have entered private property without land access agreements.
 - There have been requests from local residents to ARTC to have all contractors vehicles clearly labelled so that increased activity can be validated as IR related, and monitored by the local Neighbourhood watch group. This is essential to maintain current safety standards and low crime rates within our community, and we note that contractors constantly disregard this request.
 - There is genuine concern within the Pampas Neighbourhood watch group that work camps and contractor engagement through construction phase will erode the safety standards and low crime rates that we currently experience in our small, cohesive rural community.

We note that no specific risk avoidance or mitigation measures have been addressed in the EIS around community safety due to increased construction activity. This contravenes TOR 11.140.

3. The draft EIS clearly articulates the likely impact on social and mental wellbeing of small regional communities affecting aspects such as
 - impact on community values including amenity and lifestyles, community cohesion, connectivity and rural character
 - anxiety and business disadvantage due to decreasing property values and/or displacement
 - Construction noise or dust to affect the amenity of households living near construction works and laydown areas
 - Distress in relation to changes to lifestyles, e.g. movement patterns, enjoyment of scenic rural character
 - Operational noise affecting the amenity of nearby homes and community facilities

However, no detail is provided about how these social impacts will be minimised or mitigated and, as such, the draft EIS is incomplete according to TOR Condition 11.140.

- Section 15.9.5 states that *A more detailed Community Wellbeing Plan will be developed in cooperation with key stakeholders during the detail design phase.* Appendix U highlights that the *relevant and effective impact mitigation and benefit enhancement* details have not yet been determined. Appendix U states: *During the detail design phase, the Project will prepare a Community Wellbeing Plan to provide a framework for cooperation with key stakeholders to implement mitigation measures addressing impacts on quality of life or wellbeing as the result of Project impacts on amenity, character, cohesion or connectivity.* From this statement it is obvious that the draft EIS is incomplete as it has not addressed these issues in detail.
 - Additionally, given past performance of ARTC's lack of professional communication and ineffective engagement strategies, together with an approach that is devoid of empathetic and sensitive consideration of community mental health and well-being, we do not have confidence in their ability to oversee or develop a detailed Community Wellbeing Plan.
4. The small locality of Pampas lies in close proximity to the proposed rail corridor. Not all residences in Pampas have been identified to lie within the area impacted by noise and vibration of the rail during both construction and operation (Chapter 14), and we question why some residences are included and others are omitted. We firmly believe that all residences in Pampas will suffer from daytime disruption and night-time sleep disturbance factors due to construction and operation of the rail, as mentioned in Section 11.4.
- No alternative solutions have been discussed with the Pampas Neighbourhood Watch committee for a feasible alternative with less social impacts on day-to-day activities within the community.
5. In Section 15.7.1 of chapter 15 in the draft EIS, reference is made to a stakeholder engagement activity a community survey targeting landowners, community members, business owners and community organisations in the Toowoomba and Goondiwindi LGAs.
- A total of 121 survey responses was received, of which 114 respondents identified a residential location. Approximately 83% of surveys of these were from residents of the Toowoomba LGA (101 surveys), with 7% from the Goondiwindi LGA (nine surveys) and the balance from other LGAs. With a population of approximately 160,779, survey results from the Toowoomba LGA sample have very limited statistical validity, while the small sample for Goondiwindi LGA has no statistical validity. This survey result must be repeated in a more effective manner to gauge community response as, in its current form, it is not a valid component of the SIA, nor can it provide insights into local community characteristics and views. *(taken from Appendix U).*
 - Claims are taken from this survey in the EIS document such as *Respondents to the community survey across the impact assessment area commented widely on the strength and cohesion in their respective rural communities and how readily people support each other in times of need.* As the survey is underrepresented in response with no statistical validity, all claims on survey opinions should be removed from the EIS document.

- Very few residents from our local community in Pampas participated in the survey as it was poorly advertised and promoted by ARTC within our region, and residents were unaware of any involvement by Elliot Whiting as the SIA proponents until the EIS was released. In this way, the SIA survey does not represent *views of the community members who may be impacted by the project* (Table 15.3 and TOR Section 11.21(d)) and the survey should be redone until sufficient responses are received to represent community views.

SUGGESTED SOLUTION

The draft EIS submitted by ARTC should be rejected on the grounds that:

1. It does not comply with the Terms of Reference set by the Coordinator-General on 16 November 2018.
2. The draft EIS is incomplete due to the omission of a Community Wellbeing Plan that will not be completed until the detailed design phase. This Wellbeing Plan must be developed by an independent facilitator working independently of ARTC as their stakeholder engagement has been unsuccessful and has had a negative impact on community health and well-being.
3. The draft EIS is incomplete as indicated in Table 23.5. The true social impact on the community of Pampas cannot be determined until the details of the project footprint, level crossing design, utilities, signalling and communication, vertical alignment of the railway, bridge structure design, and fencing strategy have been completed. As with all of our prior interactions with ARTC, the detail is scant and is “not yet available”.

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Signature:

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Section of the EIS

This submission addresses the following Sections of the EIS document

- Appendix C p11 2.5 Consultation approach described in Figure 2.1 ad Table 2.1
- Appendix C Table 2.2 Project key stakeholders – Community groups
- The incomplete nature of Chapter 23 Table 23.5 of Main Project Aspects To Be in the EIS document demonstrates the incomplete nature of the EIS in its current form, and hence does not address the Terms of Reference for the EIS

Description of the issue

1. Failure of the EIS to acknowledge the Pampas Rural Fire Brigade as an affected community group, and failure to list the PRFB Shed as a Sensitive receptor (Other)
 - a. In Appendix T p91 Figure 17 the Pampas Rural Fire Brigade Shed and facilities have **not** been identified as a Sensitive receptor (Other) in the rail corridor, although they are situated directly beside the Pampas Memorial Hall.
 - b. Additionally, the information in the EIS document is incomplete, as The Pampas Rural Fire Brigade (RFB) is omitted from the list of affected community groups in Table 2.2 (Appendix).
 - c. In Chapter23, Section 23.4.10.2 the EIS states *Level crossings will result in periodic disruptions to traffic, including potential to delay emergency vehicles during operation*. Yet in Table 23.5 of Chapter the level crossing design has not been completed, hence the EIS document does not provide the necessary detail for our local Pampas RFB to comment on social impacts and safety concerns in our local area.
2. In Figure 2.1 of Appendix C, ARTC claim that the consultation process allows key stakeholders to participate across five key elements of decision making to “Inform, Consult, Involve, Collaborate and Empower” affected local communities. In Table 2.1 of Appendix C, ARTC claim that they will “Build trust, Build credibility and Build visibility”.

It is our community experience in the Pampas region that ARTC have not listened to community concerns or undertaken the Stakeholder Engagement process claimed in Appendix C of the EIS document. Specifically, they have not informed or consulted with the Pampas Rural Fire Brigade in any way.

For example:

- There has been no attempt by ARTC to contact or engage with the Pampas Rural Fire Brigade association about the issues surrounding access to the emergency services, nor to address the noise and vibration impacts on PRFB facilities in the rail corridor.
- The release of the EIS provides the first concrete evidence we have from ARTC about the location of the PRFB shed and facilities in the rail corridor and the expected impact on the facilities through noise and vibration from the rail line, as there has been no formal consultation between ARTC and the PRFB.

- The PRFB shed is in the current rail corridor and is situated approximately 70m from the proposed rail line. It is the hub of the volunteer fire service amenities and the rail will impact on these activities in a detrimental way. Ultimately, access to the shed will be restricted at certain times, and noise and vibration will adversely impact electronic training equipment and also regular training and maintenance activities.
- Additionally, PRFB volunteers will be subjected to excessive noise and vibration as residences are in close proximity to the rail corridor, and the volunteer firefighters will be impacted in a detrimental way due to proximity to the rail line and adjacent level crossing.
- This behaviour of ignoring adversely affected community groups further erodes trust and credibility of the project proponent (as claimed in Aims and Methodology of Stakeholder Engagement in Table 2.1, Appendix C)

Suggested solution

1. The community consultation process needs to be completed to ensure a fair process where community concerns are “heard, acknowledged, considered” and that the community is truly empowered in influencing the best possible outcome in their region of influence.
2. The consultation in the Pampas region needs to revisit decisions around rail and bridge design in the village of Pampas, road access changes and the impact on residences, local businesses and local support groups.
3. The EIS document needs to be rejected in its current form, and completed to include all affected local community groups as stakeholders in Table 2.2.
4. The EIS document needs to be rejected in its current form, and completed to include all details around road and rail design, including level crossing, so that we can address impacts on emergency services within our local community, according to the Terms of Reference for the EIS.
5. We request that the Coordinator-General invites ARTC to withdraw the draft EIS and ensure that all necessary items under the terms of reference are incorporated into the draft EIS for the Coordinator-General and stakeholders, including affected landholders on the Condamine River floodplain; to consider and comment on Project footprint including areas to be acquired, final level crossing design, utilities, cross drainage configuration, signalling and communications, vertical alignment of the railway, bridge structure design, fencing strategy, impacts to QR assets, concrete facility, construction water, borrow pit locations, and non-resident workforce and accommodation.

Subject: Inland Rail

The Community of Pampas would like to take the opportunity to respond to the TOR re the Inland Rail review.

Our main concerns are in relation to Section (c) of the terms of reference: *c) review the process for selecting the Inland Rail route to confirm it is fit for purpose and has considered both impacts and potential broader economic benefits to regional economies and communities:*

- We believe that a thorough and detailed review into the route selection process needs to be carried out.
- We believe that a thorough and detailed review into the impacts to communities, such as ours with no foreseeable benefit, needs to be carried out.
- We believe that a thorough and detailed review of the business case needs to be carried out.

The Corridor Selection Process

On November 30 2016, the then Infrastructure Minister, The Hon Darren Chester, appointed Bruce Wilson to the position of Chair of the Yelarbon to Gowrie Project reference Group (PRG). Several members of our local community and many others, well known to us, from neighbouring communities sat as representatives on this PRG and participated in the process. This process was supposed to be an open and transparent look at comparing four possible route selections. It is well known from those involved that the result of this process was determined prior to its commencement. The MCA scoring process was concluded behind closed doors with no community representatives present.

The *Corridor Options Report* released on April 21 2017, is riddled with inaccurate and questionable information, and is too detailed to discuss in this short letter.

We now refer to the *B2G Corridor Options Report* released in late April 2017, with specific reference to *1.0 Executive Summary, page iv, Table 2, Construction costs estimates*. This Table appears again on page 134 as table 123, and again on page 140 as Table 131.

We would like to bring to your attention the fact that these costings are inaccurate. In this report The Condamine Floodplain, consisting of three Major channels, Grasstree Creek, The Condamine River and the Condamine River North Branch had less than 1.5 km length of bridging. Since the release of the report, there has been an extension to 6.1-6.2 km of bridging. This extra bridging has never been costed and was not included in the PRG process. Additionally, the original bridging in the PRG for this route was not costed properly. This is because, the community made ARTC aware that the Condamine crossing is across vertosol soil types. This has resulted in a change in design where the structure is supported by large concrete piers (1.5 meter diameter), which are 30 meters deep in the soil. These piers are placed at 14-16 meter spacings along the linear alignment. Then there are the hundreds of extra culverts that now total 1.8km of the linear alignment, this volume of culverts and associated structure was not allowed for in the original PRG calculations. These changes could add \$400-\$600M in construction costs to this route which were not in the PRG comparison. The length of the Condamine flood plain crossing is around 1% of the total length of the proposed Inland Rail Melbourne to Brisbane plan, yet may consume as much as, or more than, 8% of the build cost. This needs to be correctly reviewed.

Impacts v Benefits.

As we have attached copies of our EIS responses to the Queensland Coordinator General, you will see that our community is seriously impacted by this project, and there is no benefit to our community. While grain growing is by far the largest industry in our community, we will not be able to utilise Inland Rail. At the moment we can load trucks on our farms and have that grain at the Port of Brisbane within three hours. If we were to try and use Inland Rail, we would need to pay high cost, short haul freight to a Freight hub, then pay a handling fee to have it loaded onto Inland Rail. We would then have the Inland Rail freight charge and our grain would still not be at port as IR ends at Acacia Ridge. So, then another handling fee to load our grain onto another, expensive short haul truck to deliver it to port. The end result is at least double the freight cost to us if we use Inland Rail. This problem of Inland Rail not going to port, means that no one in Queensland will use it because the freight charge will cost too much in comparison with available one trip road freight. Therefore, our community gets no benefit from this project. We also question the use of Inland rail for NSW grain growers, who already have a shorter rail connection to the ports of Newcastle, Sydney and Wollongong. It would make no sense to rail freight NSW grain to Acacia Ridge or Bromelton then have the grain trucked to the Port of Brisbane. The ARTC Business Case released in 2015 and the report, Inland Rail Supply Chain Mapping, released by CSIRO in early 2022 seem to contain questionable and 'fanciful' assumptions. The business case needs to be reviewed in a truthful manner.

After we had the opportunity to respond to the EIS, we were informed by ARTC that the project required road changes at Pampas. One problem with this was the fact that the 'Hall paddock' would be almost completely consumed by a road and associated drainage works. The Hall paddock is a small paddock beside our community Memorial Hall. We grow crops in this paddock which are then sold, and the proceeds are used to maintain the hall. This will mean a significant loss in hall funds to our community, and is another typical example of the lack of community consultation displayed by ARTC.

Thank you for the opportunity to respond,

Graeme Kelly.

[REDACTED]

Mal Hegarty.

Chair, First Officer, Pampas Rural Fire Brigade.

Michael Hegarty.

Chair Pampas Neighbourhood Watch Rural.

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Thank you for the opportunity to respond,

Graeme Kelly.
Chair, Pampas Progress Association.

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