Goondiwindi Regional Council
EIS Inland Rail Submission
North Star to Border EIS Review
September 2020

Introduction

The North Star to Border section (NS2B) of the Inland Rail is State Significant Infrastructure under the Environment Protection and Biodiversity Conservation Act 1999 (NSW) and the Environmental Impact Statement (EIS) is on exhibition for input from impacted parties. While the project is not located within the Goondiwindi Regional Council (GRC) region, it will be impacted by the project.

Each item raised during Council's review is shown below, together with an associated comment provided:

BIODIVERSITY (Chapter 11) **Regulated Vegetation – Vegetation Management Act 1999** *The infrastructure footprint and construction activities could potentially impact regulated (native) vegetation through clearing.*
Comment: The infrastructure development does not extend beyond the QLD/NSW border, therefore it is unlikely that native (regulated) vegetation will be impacted in the Local Government Area (LGA).
BIODIVERSITY (Chapter 11) **Protected Flora – NC Act, EPBC Act** *Construction activities and the infrastructure footprint could potentially impact protected flora individuals and their habitat through clearing, weed establishment and proliferation and introduction of edge effects.*
Comment: The infrastructure development does not extend beyond the QLD/NSW border, therefore it is unlikely that native (regulated) vegetation will be impacted in the LGA.
BIODIVERSITY (Chapter 11) **Protected Fauna – NC Act, EPBC Act** *Construction activities and the infrastructure footprint could potentially impact protected fauna individuals by direct mortalities if fauna spotting/catching activities are not undertaken during construction. Threatened fauna habitat may also be impacted through clearing, weed establishment and proliferation and introduction of edge-effects.*
Comment: The infrastructure development does not extend beyond the QLD/NSW border, therefore it is unlikely that native (regulated) vegetation will be impacted in the LGA.
BIODIVERSITY (Chapter 11) **Threatened Ecological Communities – EPBC Act** *Construction activities and the infrastructure footprint could potentially impact TECs through clearing, weed establishment and proliferation and introduction of edge-effects.*
Comment: The infrastructure development does not extend beyond the QLD/NSW border, therefore it is unlikely that native (regulated) vegetation will be impacted in the LGA.
BIODIVERSITY (Chapter 11) **Pest/Restricted Flora – Biosecurity Act, EPBC Act** *Construction activities have the potential to cause proliferation of pest plants/weeds.*
Comment: The infrastructure development extends to the border from North Star, meaning that mobilisation of pest plant seeds is possible. Therefore, there is potential for weed spreading and proliferation in the GRC region.

BIODIVERSITY (Chapter 11)
Waterways – Fisheries Act 1994, Water Act 2000, EP Act, Water Act 2007 (Cth)
Construction activities relating to Department of fisheries watercourses could potentially impact fish movement if barriers are introduced. Additionally, construction activities and establishment of infrastructure adjacent to the water course could affect water quality through pollution, sediment discharge and potentially changing hydrology.

Comment:
The infrastructure project involves the crossing of several waterways including the Macintyre River. These crossings have not been evaluated against the Queensland Fisheries Act and as such the impact upon fish passage is somewhat uncertain. Waterways were classified with the *Fairfull and Witheridge 2003* document titled, *Why do fish need to cross the road? Fish passage requirements for waterway crossings*. It is ambiguous as to whether this document encompasses the DAFF definitions of fish passage waterways within Queensland.

HERITAGE CONSIDERATIONS
Heritage (Chapter 12)
Aboriginal Cultural Heritage Act 2003
The infrastructure footprint and construction activities could potentially impact Aboriginal cultural heritage values.

Comment:
The infrastructure development does not encroach on any Aboriginal heritage values (including associated activities such as vehicular movement and stockpiles etc). Heritage is unlikely to be impacted in the LGA. This was established through there being no registered values on the Department of Aboriginal and Torres Strait Island Partnerships (DATSIP) register.
However, should unexpected values be unearthed, it is advised that works should pause until an appropriate cultural heritage assessment can occur and the site be cleared.

HERITAGE CONSIDERATIONS
Heritage (Chapter 12)
Queensland Heritage Act 1992
The infrastructure footprint and construction activities could potentially impact European heritage values.

Comment:
The infrastructure development does not encroach on any European heritage values (including associated activities such as vehicular movement and stockpiles etc). Heritage is unlikely to be impacted in the LGA. This includes heritage listed values at International, Commonwealth, State and Local levels, as well as the National Trust of Queensland.

NOISE AND VIBRATION (Chapter 16)
Noise and Vibration – EP Act
The construction activities have the potential to increase traffic resulting in increased noise and vibration.

Comment:
The greater production of noise and vibration has potential to impact human health and well-being.

PART A TRAFFIC AND TRANSPORT (Chapter 20)
Legislation, policies, standards and guidelines (Ref. Sec. 20.2)

The following documents are referenced for the Queensland authorities:

- *Transport Infrastructure Act 1994 (Qld)*
- *Local Government Act 2009 (Qld)*
- *Guideline to Traffic Impact Assessment (GTIA), (DTMR, 2018)* The GTIA has been used as a point of reference for the traffic and transport assessment, as it relates to roads and intersections affected by the construction and operation of the proposal. The GTIA has been agreed with and accepted by the Roads and Maritime Services (RMS) (NSW) as the traffic impact assessment guideline document. Although the guidelines only apply to SCRs, local government authorities may choose to adopt or use this guideline as a reference.
- *Austroads Guide to Traffic Management Part 12: Traffic Impact Assessments (Austroads, 2016)*
- *Austroads Guide to Traffic Engineering Practice Part 2: Roadway Capacity (Austroads, 1988)*
- *Austroads Guide to Traffic Management Part 3: Traffic Studies and Analysis (Austroads, 2017c)*

Comment:

a) The issue which should be clarified in the EIS process is which legal entity has the ability to enforce compliance of NSW legislative outcomes, such as EIS conditions of approval which will be implemented within Queensland.

b) The use of the Guideline to Traffic Impact Assessment (September 2017) focuses on the impacts of level of service in terms of the road volume capacity rather than the structural capacity and consumption of the useful life of pavement with increased number of Equivalent Standard Axles (ESA's). Local government impact assessment should be based on an asset management approach rather than a service volume approach.

c) The use of Austroads Guide to Traffic Management is supported.

PART A TRAFFIC AND TRANSPORT (Chapter 20)
Traffic, transport and access study area (Ref. Sec. 20.3)
The road network is anticipated to be used for the transport of workforce, materials and equipment during the construction and operational phases of the proposal. The following is the estimate of the activity on the network.

Comment:
Construction traffic:

- Workforce: The total site team is expected to peak at approximately 250 to 350 team members from week 50 through to week 80 of the project. The construction workforce would be housed in temporary camp accommodation at North Star. It is not intended to use direct access to workforce from Goondiwindi, therefore no impact is likely. However, there will be additional trips to service accommodation and for change in shifts from the workforce origin.
- Pre-cast Concrete Routes: It has been assumed that pre-cast concrete for the proposal will be delivered from established yards in Toowoomba, approximately 180 km northwest of the proposal alignment. The route likely to be used will be the State Controlled Roads (SCR). However, there may be a possibility of a concrete stressing yard being established in Goondiwindi (given the number of girder units required across the flood plains). Wide loads on the SCRs will impact on local users.
- Quarry Routes: It has been assumed that all quarry materials such as ballast for the proposal will be supplied from quarries south of North Star.
- Concrete Routes: It has been assumed that all concrete for the proposal will be supplied from Goondiwindi. As there are two (2) batching plants in Goondiwindi, the report assumes use of the closest plant (Boodle street). However, the latter has not been in operation recently. Routes to the site will impact on the local street network.
- Spoil Disposal Management: Spoil material is to be disposed of locally, while waste material (depending on the types of waste) will be transported to local waste disposal facilities and treated in accordance with their governing rules. This may impact on the GRC waste facility and the Kildonan and Rubbish Tip Roads
- Consolidated Sleeper Routes: For the purpose of this assessment, concrete sleepers are assumed to originate from Grafton, therefore there will be no impact.

Operational transport routes:

It is expected that operational traffic will be irregular and inconsequential, with no envisaged impacts to operational conditions of the surrounding road network. This is further discussed below.

PART A TRAFFIC AND TRANSPORT (Chapter 20)
Methodology (Ref. Sec. 20.4)
The DTMR Guide to Traffic Impact Assessment 2017 (GTIA) has been agreed with and accepted by Roads and Maritime Services (RMS) (NSW) as the basis for this assessment.

Comment:
As noted above, this impact assessment in GTIA does not relate to the lower order roads of local government. Construction of these roads is based on pavements with minimal pavements depths and while

in some cases have sufficient serviceability for traffic numbers. The structural pavement strength will be significantly compromised with increased ESAs for heavy vehicles used in construction activity.

PART A TRAFFIC AND TRANSPORT (Chapter 20)
Proposal traffic (Ref. Sec. 20.4.1.2)

- **Traffic generators**

Construction activities:

Impact on GRC roads is estimated to be limited to in-situ concrete trips generated from the concrete batching plant in Boodle Street Goondiwindi. The table below shows the estimated trips over the project on Boodle and Hunter Streets. Information in the table below is extracted from Appendix M Traffic Impact Assessment).

Trips	2021	2022	2023
Average annual trips	709	3,837	1,051
Daily peak trips	13	22	8

The EIS assumes the material delivery will be evenly distributed across the 12-hour construction shifts.

Comment:
It should be noted the EIS has made reference to the Boodle Street batching plant which has not operated for a few years now. The main concrete batching plant in Goondiwindi is located in Town Common Road. The same comments will apply to this road as the as the batching plant proponent selected for the EIS.

Supply of insitu concrete should also include the material (aggregate and cement) supplies to the batching plant. The total tonnage and corresponding ESAs would be almost double the predicted traffic generation associated with the operation of the batching plant.

In-situ concrete pours are generally not spread across a shift. Peak hourly trips will be higher than expected.

PART A TRAFFIC AND TRANSPORT (Chapter 20)
Proposal traffic (Ref. Sec. 20.4.1.2)

- **Construction Staging**

This will be assessed as a part of the detailed design for the proposal when a construction contractor is appointed. Ongoing consultation with road authorities will continue throughout the life of the project to ensure peak periods are communicated and captured within the Projects Traffic Management Plan.

Comment:
GRC will require input to the Project's Traffic Management Plan on an ongoing basis however the proponent as the contact principal should not transfer the local management to the contractor. The onus should remain with the proponent.

PART A TRAFFIC AND TRANSPORT (Chapter 20)
Proposal traffic (Ref. Sec. 20.4.1.2)

- **Operational Traffic**

It is anticipated that operational traffic will be insignificant due to infrequent maintenance vehicle movements and transportation of maintenance material within the rail corridor.

Comment:
It should be noted that the life of the project is undefined and therefore there may be future impacts such as natural disaster recovery works and major replacement works over the life of the asset. The proponent has understated the potential impacts of the operational phase of the proposal. Therefore, it may not be accurate in dismissing the operational impact. This issue should be reviewed.

PART A TRAFFIC AND TRANSPORT (Chapter 20)
Proposal traffic (Ref. Sec. 20.4.1.2)

- **Cumulative Impacts**

Construction schedules relating to other Inland Rail projects and major developments in the region were considered to establish schedule overlaps, i.e. where construction routes are used for several Inland Rail projects during the peak period.

Comment:
The timing of the Border to Gowrie section of the Inland Rail project may now be delayed due to the route review and the flood review. However, the cumulative impacts should not be related to peak traffic numbers but the accumulative impact to the pavement structure and the loss of useful life of the pavement should be assessed. The premature intervention to rehabilitate the pavement will result in bring forward costs which should be addressed in the impacts. This issue highlights the concern of using the GTIA for assessment of impact on the local government road network.

PART A TRAFFIC AND TRANSPORT (Chapter 20)
School Bus Routes (Ref. Sec. 20.5.6)

School bus routes likely to be impacted by construction traffic routes:

P450 - Seven Mile to Inglewood State School - 1 x AM, 1 x PM - Cunningham Highway
P451 - Yelarbon to Yelarbon State School - 1 x AM, 1 x PM - Cunningham Highway
P473 - Yuraraba to Inglewood State School - 1 x AM, 1 x PM - Cunningham Highway

The proposed mitigation is that the contractors will be made aware of the presence of school bus routes, bus stops and their operational hours as part of the induction process.

Comment:
The school bus route to be included in the Traffic Management Plan to ensure the route planning and delivery time of oversize vehicles accommodates the safe movement of school buses.

It is also noted that a school bus route along the Cunningham Highway to Goondiwindi schools is not referenced in the EIS.

PART A TRAFFIC AND TRANSPORT (Chapter 20)
Traffic Impact Assessment (Ref. Sec. 20.7)

- **Traffic growth rates (Ref. Sec. 20.7.1.1)**

An average annual growth rate of 2% for SCRs and local government roads was assumed. This assumption is considered to be acceptable for the local government road network. Any major growth from development above 2% can be considered under the planning development assessment for the specific development.

Comment:
The suggested growth rate is reasonable however, it is not impacting on the assessment of construction traffic.

PART A TRAFFIC AND TRANSPORT (Chapter 20)
Traffic Impact Assessment (Ref. Sec. 20.7)

- **Construction traffic impact (Ref. Sec. 20.7.2.1)**

Construction traffic impact on GRC road and street network is a result of concrete supplies from the concrete batching plan in Boodle Street and the route to the SCR is via Hunt Street. The estimate increase in traffic as a result of construction is 5.1%.

Comment:
Traffic increase on GRC streets only just exceeds the GTIA traffic impact trigger of 5% and may not be seen as an issue. However, given the oversight of the material supplies to the batching plant, traffic generation may be underestimated and oversight of the accumulation of ESAs of the pavement this impact should be reviewed. The issue of the active concrete batching plant should also be revisited.

PART A TRAFFIC AND TRANSPORT (Chapter 20)
Traffic Impact Assessment (Ref. Sec. 20.7)

- **Intersection impacts (Ref. Sec. 20.7.2.2)**

Given the short duration of construction-related traffic, traffic management strategies may be introduced in order to ease construction-related traffic impacts at intersections.

Comment:
The intersection of Hunt Street/Boodle Street is identified as not applicable for an upgrade. The EIS identifies the intersection of Hunt Street and the SCR (Leichardt Highway) as a joint owned road. However, under the Department of Transport and Main Roads protocol with local government, Main Roads has ownership of the asset to the tangent point of the intersection, therefore there will be no impact to GRC Intersection infrastructure.

PART A TRAFFIC AND TRANSPORT (Chapter 20)
Traffic Impact Assessment (Ref. Sec. 20.7)

- **Pavement impacts on road links (Ref. Sec. 20.7.2.2)**

The findings show that only one SCR road is likely to cross the 5 per cent SAR threshold. This analysis is based on the assumption that fully loaded vehicles in each direction is conservative to ensure no underestimation of pavement impacts. The analysis indicates that the SCR road segments located in Queensland would have a minimal pavement impact given the duration of the construction activities and pavement loading.

Comment:
The findings refer only to the SCR roads and not local government roads. As the Boodle Street impact has been underestimated by not taking into account the material supply to the batching plant, the 5% exceedance should be reviewed. Again, the batching plant issue should also be reviewed to reflect the location of the source of the traffic generation.

Further, the accumulated impacts to insitu concrete routes in terms of overall pavement impacts should be reviewed as discussed in the Accumulative Impacts Section above.

PART A TRAFFIC AND TRANSPORT (Chapter 20)
Proposed Mitigation measures (Ref. Sec. 20.8)

The following mitigation measures are proposed:

- *Ongoing consultation with RMS/local governments and asset owners will be undertaken to ensure proposed access arrangements are suitable.*
- *Consideration should be given to limiting construction traffic on school bus routes during pick-up and set-down times on school days. Alternatively, appropriate school bus infrastructure could be installed.*
- *Traffic management plans, traffic control plans and temporary road works to be implemented and reviewed to ensure effectiveness.*

Comment:
While the GRC road network exceeded the traffic impact of 5% and is likely to be higher if the material supply to the batching plant is taken into account, there is no specific mitigation measure to address the impact other than with ongoing consultation with the asset owner. Current approach to assessment of traffic impact is not supported as accumulated impact over the period of Inland Rail projects on streets identified should be addressed, rather than using the GTIA traffic impact assessment process.

PART A TRAFFIC AND TRANSPORT (Chapter 20)
Conclusions (Ref. Sec. 20.11)

The results of the LOS comparison between the "with" and "without" Project scenarios indicated that the Project would not likely cause a change in LOS for any of the proposed construction traffic routes.
Hence, based on the LOS comparison, it is not expected that the Project would generate the need to upgrade the road network, but adequate traffic and road use management strategies would be required.

No intersections were found to potentially experience significant operational impacts during the construction period. Nonetheless, all intersections impacted by construction traffic should be considered through the development of the TMP.

Comment:
The level of service impact assessment approach does not reflect on heavy vehicle construction traffic impacts on the road pavement structural impact. The under estimate of the traffic to and from the concrete batching plant needs to be reviewed.

Summary Observations of Traffic Impacts
The EIS for the North Star to Border section of the Inland Rail Project identifies that GRC road network is only impacted on Boodle and Hunter Streets as a result of the supply of in-situ concrete for the construction.

It should be noted that this batching plant has not operated for a few years and the only other plant in Goondiwindi is located in Town Common Road.

Mitigation proposed is to ensure ongoing consultation with the asset owners through the preparation of Traffic Management Plans.

The result of findings is not a satisfactory outcome for the community of Goondiwindi in respect of the following:

- The only operational batching plant in Goondiwindi is located in Town Common Road and not Boodle Street.
- Traffic analysis does not recognise the full impact of supply of materials to the batching plant as well as concrete supply.
- Methodology of the Guideline to Traffic Impact Assessment (DTMR 2018) is not a suitable approach for lower order local government roads, as the impact on these roads is related to pavement deterioration and not service volume. Low traffic numbers are reflected in pavement designs and therefore high numbers of introduced equivalent standard axles of construction traffic not anticipated in the design reduces useful life of the pavement.
- The accumulated impact of the construction traffic route for the Inland Rail project (as a whole rather than sections) may have a more significant impact on road pavements rather than an assessment on traffic numbers for each section.

PART B WASTE AND RESOURCE MANAGEMENT (Chapter 25)
The EIS states that the amounts of waste likely to be produced from the proposal are expected to be minor in the context of broader waste generation practices. There will be waste streams, including municipal solid waste from the construction camp, that may not be able to be managed through waste avoidance and mitigation strategies to minimise potential impacts on surrounding environmental values and sensitive receptors, and these waste streams will be disposed of within appropriately licensed waste facilities.

Comment:
GRC waste facilities are located within close proximity to the project site and may be a likely waste disposal solution.

PART B WASTE AND RESOURCE MANAGEMENT (Chapter 25)

- **Table 25.3 Existing Waste Management Facilities within 150kms of the proposal**

Comment:

- Goondiwindi Transfer and Landfill Facility.
- Charges apply along with State Landfill Levy.
- Regulated waste from interstate is not accepted for demolition work.
- There is no facility to receive liquid waste at this site, e.g. grey water or black water.
- There are Resource Recovery Areas for the following materials: green waste, scrap metal, concrete/brick suitable for crushing, waste oil, batteries, DrumMuster chemical containers and tip shop for second hand goods.

- The licence capacity at Goondiwindi is 5,000 – 10,000 tonnes/annum and this could be a limiting factor should there be large volumes of waste proposed to be delivered as part of the Inland Project. Current receivals are between 8,000 – 8,500 tonnes/annum.

PART B WASTE AND RESOURCE MANAGEMENT (Chapter 25)

- **Inglewood Landfill – This site now operates under a new Environmental Authority (EA0002129)**

Comment:

- The site has been redeveloped with a new weighbridge installed, security fencing and restricted access to the landfill component of the site for commercial, demolition and limited volumes of regulated waste being accepted on Wednesday of each week between (8am – 12pm) with charges applying similar to Goondiwindi.
- There is an internal transfer facility (3 x 30m^3 bins) in a section of the site that is open seven (7) days for delivery of domestic waste.
- There are Resource Recovery Areas for the following materials: green waste, scrap metal, concrete/brick suitable for crushing and waste oil on a reduced scale to Goondiwindi.
- There is no facility for receiving liquid waste at this site.

PART B WASTE AND RESOURCE MANAGEMENT (Chapter 25)

- **Yelarbon Landfill**

Comment:

- This landfill is now closed and has been converted to a transfer facility with (2 x 30m3) transfer bins for domestic waste only.
- There is no facility for receiving liquid waste at this site.

PART B WASTE AND RESOURCE MANAGEMENT (Chapter 25)

- **Waste Generation (Ref.Sec.25.6)**

Comment:

The ability to provide comment on the acceptance of the various waste streams at the current stage of the document presentation is limited by the lack of waste volumes and types. Further data is to be provided in the Construction Environmental Plan (CEMP). Average solid waste generation is around 63t/year.

The size of the purpose-built construction camp and five (5) year construction phase will generate considerable volumes of waste either through the landfill process, recycling or container refund scheme returns.

There is considerable cost to Council in order to deliver recyclables to the Narrabri Material Recovery Facility (MRF) and if materials are delivered to Council's facility, charges would have to be applied.

Additional Charges would also apply to the 2,500t of timber sleepers and 260t damaged concrete sleepers to process them such as crushing if delivered to Council's facility.

PART B WASTE AND RESOURCE MANAGEMENT (Chapter 25)

- **Existing Waste Generation (Ref.Sec.25.6.1)**

Comment:

Goondiwindi Regional Council (GRC) is currently positioned within the area which attracts the State Landfill Levy charge on top of Council's waste charges for the manned and partly manned landfill sites.

PART B WASTE AND RESOURCE MANAGEMENT (Chapter 25)

- **Waste Classification (Ref.Sec.25.6.2)**

Comment:

Reference has been made to New South Wales Legislation. If the disposal is to a GRC facility then Queensland Legislation the Waste Reduction and Recycling Act 2011 is applicable.

PART B WASTE AND RESOURCE MANAGEMENT (Chapter 25)

- **Construction Waste (Ref.Sec.25.6.3)**

Comment:

Volumes of ballast, old rails and sleepers that are to be disposed of will potentially cause concern for smaller sites, whereas larger waste facilities may be able to handle some of the materials into their Resource Recovery Areas. Volumes stated in Table 25.5 of the EIS would place considerable pressure on a waste disposal site the size of Goondiwindi in order to take all the volumes of materials quoted.

Clean uncontaminated fill is always desirable for landfill site for cover and capping of the cells, however there does not appear to be large volumes surplus to the project needs.

PART C WATER FOR CONSTRUCTION

Proposal water requirements and usage (Ref. Sec. 13.6.2.1)

The EIS proposal for water supply for construction purposes is:

Water requirements for earthworks and track works during the construction phase would be met with water sourced from the Boggabilla Weir, located on the Macintyre River, approximately nine kilometres upstream of Goondiwindi. The weir has a storage capacity of 5,850 ML and is used to regulate releases from Glenlyon Dam and to conserve unregulated inflows. There is an opportunity to apply for an approval or licence to take construction water from this water source to fulfil the construction water requirements. It is assumed the licence would be for approximately 100 ML per year (1.7 per cent of the weirs storage capacity) for a duration of approximately three years.

This proposal will have to be progressed with the Border Rivers Commission. Any impacts associated with this water extraction would be assessed as part of the water-use approval.

Comment:

Boggabilla Weir is a very important supply and regulating structure for GRC in supply of water to the Goondiwindi township. Boggabilla Weir and Goondiwindi Weir contain the only water GRC had any access to in the height of the recent drought when the river stopped flowing.

As the Weir is an integral component to the water security of Goondiwindi the EIS should acknowledge its relevance and address this issue as part of the EIS rather than defer it to a later water use approval process. This later process will not provide the certainty Council requires to manage the potential impact.

PART D CUMULATIVE IMPACTS (Chapter 26)

Traffic and transport (Ref. Sec. 26.4.9)

The conclusion of the EIS in terms of Traffic and Transport: The construction of other projects considered in the assessment were not expected to overlap with the construction of the proposal or have indeterminate construction schedules at the time of the assessment. As such, the significance of cumulative impacts was considered low and impacts potentially arising from these could be managed through standard management practices.

Comment:

The accumulative impacts on road pavements are well documented. The supply of insitu concrete for a batching plant in Goondiwindi will reduce the pavement life of the street giving access to the concrete batching plant. The impact to the pavement should be assessed and the EIS appropriately reviewed to address the financial impact where necessary and the mitigation proposed.