

File: Inland Rail - EIS Submission NS2B
Date: 30 September 2020

Director Transport Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Via email: alexanderscott@planning.nsw.gov.au

Dear Alex,

Environmental Impact Statement Review - Inland Rail Project, Goondiwindi Regional Council

Thank you for the opportunity to comment on the Environmental Impact Statement (EIS) for the North Star to Border (NS2B) section of the Inland Rail project prepared and submitted by the Australian Rail Track Corporation (ARTC).

It is noted that the EIS only pertains to the New South Wales portion of this section, however Goondiwindi Regional Council (GRC) has prepared a submission on the EIS noting the main issues of concern and seeking further clarification. While the detail is presented in the submission Council wishes to draw your attention to a number of critical points:

– Flooding

Council has very specific and significant concerns regarding the potential for the project to impact the dynamics of water flow through the floodplain in the New South Wales and Queensland portions of the project as they traverse our regional area. With your consent, a specific submission dealing with the specific issues regarding flooding will be provided at a later date upon the finalisation of modelling and other assessment that is currently underway. The modelling review is being undertaken with the support of the project proponent and it is accepted that the results should be taken into account in final planning of the project.

– Project Definition

It is noted that the proponent for the Inland Rail project is seeking approval to construct and operate the proposal. While the construction phase is well documented with regard to the impact, it would seem that the operational phase of the proposal is of little or no concern as represented in the EIS. The operational phase, it is assumed has no set time limit for the impacts. In the event of a major disaster or the approaching end of useful life of assets, the impact of these operational issues may well reflect on the community. Therefore, possible activities, in particular recovery from a major disaster, will impact road networks given the most likely disaster event would be flooding and the road network itself would likely be compromised.

– Road Link Impacts

Supply of in-situ concrete has been identified to be sourced from a currently unused batching plant. The currently operational batching plant is located further to the west and while there may be limited lengths of local road impacts, the traffic on these roads will be of concern to the community.

– Traffic Generation

Traffic generation will arise not only from concrete delivery to site, but material supply to the batching plant. This should be addressed in the EIS.

– Impact Assessment

Use of the Guideline for Traffic Impact Queensland Transport and Main Roads which is utilised in the EIS is suitable for State Controlled roads. It is considered that this may not be relevant to the assessment of the lower order local road network. Pavement impacts and reduction in economic life of the asset may be highly impacted from increase in heavy vehicle Equivalent Standard Axles (ESAs).

– Accumulated Impacts

Other sections of the Inland Rail will also demand resources from within the Goondiwindi region. In particular, supply of in-situ concrete will be required for other sections in this location. The combined material and supply trips for each of these sections will further reduce the useful lives of road links.

– Water Supply

Recent droughts have placed significant impacts on the Goondiwindi town water supply. The proposed use of the Boggabilla Weir for construction water could impact on the town water security if construction coincided with a drought event.

– Waste Generation

The type of waste generated and the use of Council waste facilities will require additional consideration as detailed within the submission.

– Environmental Consideration

While the project is not physically located in the state of Queensland, construction of infrastructure for the NS2B will most likely be constructed as a package including the New South Wales and Queensland sections. Delivery under both states regulatory controls should be noted as a consideration. The attached submission highlights the concerns of GRC.

– Heritage Consideration

The concern on heritage impacts is the same issue as stated above in the environmental consideration.

Given the above concerns raised regarding impacts for the Goondiwindi Regional Council and the likely mitigation of these impacts, it is expected that the proponent will be required to respond to EIS conditions of approval within the State of Queensland.

The issue which should be clarified in the EIS process, is whether conditions are enforceable and which legal entity has the ability to enforce compliance of New South Wales legislative outcomes. Further, the EIS should assist in clarification of how a local government within Queensland can address noncompliance should the delivery of conditions be contracted by the proponent to a third party.

Thank you again for the opportunity to raise concerns of the impacts of the project on the Goondiwindi Region.

Yours faithfully



**The Honourable Councillor
Lawrence Springborg AM**
Mayor
Goondiwindi Regional Council



Jason Quinnell
Acting Chief Executive Officer
Goondiwindi Regional Council