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11 March 2021

Attention: The Coordinator-General
c/- EIS Project Manager, Inland Rail – Calvert to Kagaru Project
Office of the Coordinator-General
PO Box 15517
CITY EAST QLD 4002

Dear Ms Power,

Response to Draft Environmental Impact Statement for the Calvert to Kagaru Inland Rail Project

I refer to your letter dated 16 December 2020 and thank you for inviting Ipswich City Council to provide feedback on the draft environmental impact statement report (EIS) for the Inland Rail – Calvert to Kagaru (C2K) project. Council has considered the draft EIS and has prepared a feedback report which is enclosed.

The attached feedback report is an interim document and subject to change following consideration by Council at its Ordinary Meeting of 25 March 2021. A final feedback report will be issued following endorsement by Council.

The Ipswich community express a desire to conserve the best parts of their community – character, heritage and identity, waterways, bushland, and rural areas. There is also a real desire to ensure the city creates local jobs and businesses to grow the economy. These two priorities guide Council's response to the impact assessment and mitigation strategies presented in the EIS.

The areas impacted by the Inland Rail project will be changed forever and Council is focused on ensuring the impacts of these changes are minimised and mitigated, through robust assessment and rigorous mitigation.

While the full report attached details issues in many sections of the EIS, Council has strong concerns in four particular areas:

Level Crossings

Council has heard many community members express concerns with the level crossings proposed in the Ipswich Region and advocate for bridges or road network realignments instead of level crossings. Level crossings introduce a safety risk which does not currently exist, and can only be reduced, not removed, by safety measures such as signage. Four level crossings are proposed on the C2K project in the Ipswich region, each representing potential safety concerns and additional delay to residents and businesses. There are also potential delays for emergency services, to either reach an emergency situation or transport persons with injuries to hospital.

The EIS does not meet the *Queensland Level Crossing Safety Strategy* to 'add no further open level crossings to the network.' This is a long-term project and should be designed for the highest safety standard for the future.

Noise Mitigation

Many areas along the proposed alignment are quiet, rural environments with very low background noise. These areas will be changed forever by the noise, air quality and visual impacts. The noise impact assessment and proposed mitigation strategies are not adequate to reduce the noise impacts to an acceptable level, and do not cover enough residents, businesses and other organisations in these residential and tourist sensitive areas, in particular the omission of acoustic profiling including the effects of topography and meteorology, and resultant mitigation requirements.

Noise impacts must be fully and appropriately assessed and the impacts mitigated adequately to avoid adverse impacts on residents and businesses, such as homes, farms, business premises and other organisations such as events centres.

Construction Traffic

Many of the construction routes identified in the EIS are inappropriate for the level of traffic to be generated. A more realistic plan of construction traffic routes is required, including site visits to establish the nature of the roads, and discussion with Council officers to understand the usage, history and plans for each route. Council must be able to approve the use of local roads as construction traffic routes, and to impose conditions on the use of those roads to preserve the safety, efficiency and amenity of the local road network. Traffic on some local roads will be more than doubled during construction and this must be considered a significant impact requiring infrastructure upgrades and other mitigation measures to maintain the safety and efficiency of the roads.

Flooding

Flooding is a major concern of the community which could have a significant, long term impact on residents and businesses in the region. The flood modelling used must be robust, accurate and comprehensive in order to avoid flooding impacts. The conclusions of the independent Flood Panel set up by the Australian and Queensland Governments must be taken into account in flood modelling in future design work.

Council's Willowbank Intermodal Social and Economic Impacts and Benefits Study is attached to assist the Coordinator General and the Proponent in assessing the economic impacts of the project.

Thank you for the opportunity to provide a submission on the draft Environmental Impact Statement for this project. Should you require any further information, please contact Council.

Yours faithfully

David Farmer
CHIEF EXECUTIVE OFFICER

Encl.

Inland Rail – Calvert to Kagaru

Ipswich City Council Response

to Draft Environmental Impact Statement

March 2021

Document Control

Version	Prepared By	Approved By	Date
1	Richard Hancock	Tony Dileo	08/03/2021

Contents

Sustainability

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
	Governance/ Category - Climate Response a. There is a focus on stormwater modelling and flooding impacts in relation to the climate response which is required. However, there appears to be no reference or work being undertaken to design for heat and climate variability.	a. The proponent must ensure that climate modelling, giving consideration to projected increased temperatures and climate variability, is undertaken and incorporated into the design.
	Environmental Protection/ Category - Efficient use of resources and minimisation of carbon footprint b. In the design phase of the project, climate variability will need to be considered. Whilst there is a category dedicated to resource efficiency and carbon minimisation, there is nothing specific related to the impacts of expected increased temperatures and climate modelling that will be incorporated into the design phase.	b. The proponent must undertake climate modelling and climate change risk assessment for the project and incorporate any requirements into the final design prior to construction as per AS5334.
	Governance - Future-proofing c. The EIS fails to appropriately assess carbon reduction more broadly and does not include specific design measures apart from resource efficiency.	c. The proponent must include designing for carbon reduction and climate variability into the final design prior to construction.
	Environmental Protection - Using energy, water and material resources more efficiently d. Steps to explore alternative energy sources have not been explicitly identified in the future sustainability opportunities; though selection of fuel and energy efficient plant and equipment has been referred to.	d. The proponent must explicitly state that alternative low carbon energy sources will be utilised where feasible.

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
	Environmental Protection - Pollution prevention and minimising carbon e. The EIS fails to adequately assess the utilisation of lower carbon fuels and does not provide identification of further measures to reduce carbon.	e. The proponent is required to incorporate stronger commitments and more well articulated actions (e.g. workforce travel, selection of building materials, renewable energy opportunities) in relation to carbon reduction for both the construction and operation phase of the C2K.
	General Comments f. Whilst there is a level of commitment to reducing carbon and addressing climate change in the various phases of delivery in the project; there is no articulation of undertaking a Carbon Reduction Plan and a carbon analysis of a business-as-usual approach versus the implemented sustainability approach to determine the actual carbon emissions avoided/ reduced (to meet the 15% reduction target).	f. The proponent must complete a Carbon Reduction Plan that includes a carbon analysis options assessment that assess the carbon emissions avoided due to the sustainability measures implemented into the final design. The proponent must ensure the design meets the 15% (or better) carbon reduction target.
	g. Given the project has an expected lifespan of 100 years; a stronger commitment to whole-of-life procurement processes is highly desirable - not just consider, embed.	g. The proponent must devise procurement whole-of-life specifications for product categories for the project.

Land Use and Tenure

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
8.3 Legislation, policies, standards and guidelines & 8.5.3 Future Land Use Intent and Development Activity:	a. While the Ipswich Planning Scheme has been correctly identified, it should be noted that Council is currently preparing a draft Planning Scheme.	a. The proponent must revise the assessment when the Planning Scheme is reissued.
Appendix G – Impacted Properties	b. There are a high proportion of lots which have a significant percentage of permanent disturbance, which when resumed will create fragmented boundaries surrounding the rail line. This is a concern as it will likely result in small, unviable rural lots, land locked lots and an increase in lots capable of being used to justify boundary realignments, which could potentially further fragment rural land.	b. Properties with high percentages of permanent disturbance should be resumed in entirety, or alternatively, balance land should be amalgamated into adjoining lots. An increase in small (potentially landlocked/constrained lots) in rural areas will not be supported where it can be avoided.
	c. The Queensland Land Use Mapping Program (QLMUP) dataset has a very broad 'predominant land use' categorisation. Predominant land uses have been overlooked in some instances (approximately 40 residential uses, and 7 additional land uses). The Australian Land Use and Mapping Classification Version 8 is predominantly focused on agricultural uses and consequently is unlikely to accurately identify individual uses dispersed throughout generic agricultural uses. The Australian Land Use and Management Classicisation Version 8 has the capability of identifying ancillary/secondary uses, yet these were not provided within Appendix G of the EIS.	c. Predominant land uses should be further investigated, this may be resolved by identifying ancillary/secondary uses with the QLMUP dataset. Ancillary/Secondary uses should be included within Appendix G of the EIS.

Landscape and Visual Amenity

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
Table 10.12	**Vegetated Watercourses – creeks and channels** a. The EIS proposes 'minimisation' mitigation measures for the design of the C2K in relation waterways, riparian vegetation and in stream flora and fauna and habitats. **Waterway/riparian corridors** b. The Landscape Impact Assessment fails to account for the rehabilitation or restoration of waterways other than that directly impacted by the footprint of the project. The waterways and catchments associated with this project are highly vulnerable, sensitive receiving areas of the Bremer and Brisbane River catchments. As such, and particularly considering that opportunities to address regional scale catchment and waterway quality issues are rare governments have a responsibility to respond to these environmental issues through the cross-border (state/local government) and large-scale projects of this nature when the opportunities arise. Restoration of waterways will have numerous benefits and extend far beyond the project footprint and leave a legacy for the project as a major infrastructure project which delivered transformative environmental benefits with relatively minor costs **Green Corridor** c. Likewise with the above comments regarding the opportunity for regional restoration of the environment,	a. The proponent must amend the design methodology to first 'avoid' waterways, riparian vegetation and in stream flora and fauna and habitats and if unavoidable must 'minimise' design elements. b. The proponent must amend the rehabilitation strategy to include a considerably larger portion of waterway restoration, both upstream and downstream of the crossing points to ensure a significant improvement on waterway health. c. The Proponent must amend the rehabilitation strategy to include vegetation buffers to the corridor

	consideration should be given to providing vegetation buffer to the corridor as an opportunity for: • Large scale vegetation provision; • Habitat connectivity at strategic locations; and • Improved amenity through vegetated buffers to the rail corridor (earthworks, embankments, cuts or bunding etc.) **General Infrastructure Design Comments** d. The C2K intersects the following major roads: • Boonah Road • Cunningham Highway In these locations it is noted that the C2K will cross the road via aerial crossings. On the basis that these locations are close the Ipswich LGA boarders, and impact the view sheds and amenity of existing landscape, it is recommended that an appropriate urban design response to applied at this location.	d. The proponent must provide urban designs at these aerial crossings that incorporate (but are not limited to) the following: • Visual 'gateway' architectural and landscape elements incorporating cultural heritage elements, signage or similar; • Signature or distinctive landscape design or planting; • Art installation reflective of local or aboriginal heritage; and • City signage/branding.

Flora and Fauna

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
	Koalas and Fauna Crossings a. Fauna crossings are aligned with creek crossings and related rail bridges. Although these are logical, there are no terrestrial crossings at all nor does it mean that these crossings have been prioritised and optimised for fauna movement based on an understanding of movement requirements in the area. Looking at the volume of koala data on both sides of the alignment through Ebenezer (there is also Ebenezer Creek) this area is in clear need of a crossing. b. The EIS doesn't appear to address any on-gong monitoring for koalas that would provide direction for undertaking pre-emptive measures. c. The significance of Purga creek as a fauna crossing, particularly for koalas is not recognised by the EIS. Adjacent to the creek, Purga Nature Reserve has a significant resident koala population. Maintaining their connectivity to habitat across the landscape is critical to their viability. Note – The full extent of Purga Nature Reserve is often not recognised within the document, and its value as "nature conservation". d. In addition to the rail bridge at Purga creek not being identified as a fauna crossing, there are a number of other bridge locations that would function as crossings that are not identified as such in the EIS including: • Purga Creek 2 Bridge	a. The proponent must investigate the potential for fauna crossing in a prioritised and rationalised manner rather than those coincidentally located at creek crossings. While these are logical given bridges are required for flooding purposes, they don't represent a considered approach. Council will provide further information and suggestions on suitable locations. b. The proponent must implement a long-term monitoring program which analyses for potential genetic isolation and barrier effects. This can be through analysis of scat genetics. c. The proponent must design a fauna crossing solution and consult stakeholders on its configuration. d. The proponent must design a fauna crossing solutions at the following bridge locations and consult stakeholders on its configuration: • Purga Creek 2 Bridge • Mount Flinders Rail Bridge

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	• Mount Flinders Rail Bridge • Sandy Creek Rail Bridge Of note, the above are located where the corridor traverses koala habitat and sites with evidence of their activity.	• Sandy Creek Rail Bridge
	e. The EIS makes no reference to how wildlife carers can be supported through construction and operation activity should there be increased wildlife injury e.g. train and haulage truck strikes.	e. The proponent must propose measures to reduce potential impact on carers.
	f. The EIS makes reference to a fauna crossing strategy. Access to this document or information would be helpful to understand treatment etc.	f. The proponent must make available the fauna crossing strategy prior to approval.
	Melaleuca Irbyana g. The EIS studies conducted by various consultancies do not follow the precautionary principle with regards to calculating the total extent of Melaleuca irbyana threatened ecological community (TEC) within the study area. The definition being used to map irbyana TEC is far too narrow given there is currently very limited advice from the Commonwealth on definitions of what is a TEC vs what is just an individual specimen. There are a number of large thickets within the study area that have not been identified as being a TEC, despite ARTC commenting that they have taken a cautionary approach to mapping the TEC. Although non-remnant patches it does not exclude them from being a TEC under the Commonwealth definition.	g. The proponent must amend the EIS submission to broaden the definition of Meleluca Irbyana to include a more cautious estimate of the total amount of TEC within the study area and not exclusive to remnant regional ecosystems. For example, the definition in the EPBC listing advice suggests the community is usually in thickets with emergent eucalypt species. However, nothing in this definition excludes regrowth thickets with minimal emergent canopy trees. Council can provide additional spatial data of areas that it deems to be TEC and should be included as part of the considerations of the EIS. https://www.environment.gov.au/system/files/resources/ca330310-bb3f-4651-b83f-40f30140378f/files/swamp-tea-tree-forest-information-sheet.pdf

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	h. In addition to the comment above regarding the total extent recognised in the study, councils view is that the total extent impacted is underestimated. In particular the secondary impacts associated with changes to hydrology. For example there is a 19ha patch of regrowth north of Ten Mile Swamp and east of Willowbank Raceway that is not going to be impact according to the EIS. However this is despite a large section of fill being required to meet level with a bridge over Warrill Creek that has 4m clearance. This substantial amount of fill may create a bund close to this patch which is likely to alter its hydrology. These impacts have not been adequately addressed.	h. Council can provide additional spatial data of areas that it deems to be TEC and should be included as part of the considerations of the EIS. This includes an additional 34 hectares to an existing total of around 31 hectares impacted. The proposed impacts should align more with the precautionary principle given how little is understood with the species and its hydrology. More detail around how this should occur is contained within Logan City Council guideline (linked below). https://www.logan.qld.gov.au/downloads/file/2457/guideline-for-managing-land-irbyana#:~:text=3c%20contain%20Melaleuca%20irbyana%20and,and%20Biodiversity%20Conservation%20Act%201999
	Field Survey Effort i. All of the findings and assessments are based on limited and opportunistic field surveys as well as desktop data which is never comprehensive. For many species such as greater gliders and spotted quolls this is the first time a lot of this area has ever had any sort of survey. It is therefore curious that the EIS is largely based on predictive modelling and limited targeted field research e.g. targeted spotlight effort for Greater gliders and meat baited camera trapping for quolls.	i. The proponent must undertake targeted surveys for species prior to making desktop assessments that rule out the possibility of a species occurring within the project area.
	Environmental Offsetting j. The C2k is subject to environmental offsets.	j. Consistent with Commonwealth and State environmental offsetting, council expectations are that where offsets are required, they must: • Be delivered as close as practical to the impact while avoiding areas for future development; and

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		• At a minimum, be provided in the Ipswich City Council local government area; and • Achieve additionality, being that it creates additional opportunities that would never have occurred in the absence of the offset. Additionally, Council is to be identified as a stakeholder with respect to environmental offset planning, design and delivery within Ipswich.
	Mount Flinders Road Crossing (& other similar crossings) k. Due to insufficient detail at this stage, treatment of the rail bridge and road design works at Mount Flinders Road raises some concern. A large and noteworthy Eucalyptus tereticornis is located within the road design. This is a feature of the local area. There is no mention of whether it can be avoided, and if not, what mitigation measures are proposed. It is strange the rail bridge crossing is not identified as fauna crossing considering the habitat areas on the ridge and across the floodplain. Understand this may be challenging considering a road would be within the crossing. It will likely require sufficient width and fencing to provide road and fauna movement. For other similar crossing locations where rail bridges cross roads, outlining of mitigations measures to reduce 'funnelling' of fauna onto roads to cross under the rail corridor is required e.g. fauna exclusion fencing. Besides at Mount Flinders Road other potential hotspot locations includes: • Bremer River rail bridge	k. The proponent is to incorporate designs that address impacts and fauna crossing requirements.

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	• Ipswich-Boonah rail bridge	
	l. Reassurance is required that community access along Mount Flinders Road to Council's Flinders – Goolman Conservation Estate is maintained at all times. Furthermore, consideration for information publicising Flinders Plum Picnic Area being open during construction at intersection with Ipswich-Boonah Road.	l. The proponent is to provide recognition within appropriate documentation.
	Construction Traffic Impacts m. The EIS does not provide enough information regarding management of potential impacts (i.e. vehicle strikes) to wildlife, in particular koalas, associated with increasing construction traffic on local road network - such as for spoil haulage, materials transport and workers commute.	m. The proponent must identify the extent of increased traffic, hotspot areas and detail of proposed mitigation measures.
	Detailed Design Work n. Reference is made across numerous sections to undertaking detailed design at later time. This makes it challenging to understand holistically the proposed projects impacts, suitability of mitigation measures and suitability of potential offsets. Following points highlight this concern.	n. The proponent must release proposed draft documents for public and stakeholder comment.
	o. The style and extent of fauna fencing is not detailed. Insight into fauna impacted and locations of risk should be sufficiently understood to provide this level of detail at this stage of the project and EIS development. EIS mentions collaborating with landholders with the style of fencing. In locations of Greater glider and Grey-headed Flying-foxes habitat, typically the use of barb wire is avoided. There is no mention on what will take	o. The proponent must release detail on the style and extent of fauna fencing.

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Section 6.1.7	precedent in situations where there is differences between the fencing requirements to mitigate fauna impacts and landholder preferences. p. The mitigation measures frequently mentions where practical, minimising vegetation clearing and ground disturbance. It would be helpful to understand minimum width clearing could be restricted to below the standard nominated 20m wide disturbance corridor. q. Details into the extent of clearing required for new vehicle access tracks and permanent vehicle service tracks is not provided. Again, this makes it difficult to understand the holistic impacts. **Operational Details** r. There is limited detail into the on-going operational management or commitment to environmental management and rectification. The draft Environmental Management Plan contains no approach to operationalise ongoing environmental management. s. There is limited information regarding systems for managing an environmental incident (e.g. train derailment) and associated rehabilitation of land and environmental values. **Ongoing Monitoring** t. The EIS lacks detail into on-going monitoring for wildlife in proximity to the corridor, to preventative measures that avoid strikes and deaths. Subsequently, there is no detail of ongoing commitment to retrofitting measures	p. The proponent must provide indication of minimum width and circumstances in-which this can be applied. q. The proponent must provide details of likely locations and extent of clearing (subject to further refinement). r. The proponent must update the Environmental Management Plan to cover operational matters. This document must be released to the public prior to approval. s. The proponent must provide detail on the management of an environmental incident in an updated Environmental Management Pan. t. The proponent must provide detail into the ongoing monitoring during the operation of the C2K.

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Section 11.5.2.3	should it be deemed necessary to rectify an ongoing environmental impact.	
	Specific Comments	
Section 11.5.5	u. No reference to Flinders-Goolman Conservation Estate. Understand it is not located in the study area. However, if the document is making reference to the Flinders Peak Conservation Park, which is contained within the estate and managed by council, then the estate should be referenced. The estate is a regionally significant environmental area and recreation destination.	u. The proponent must amend the EIS to recognise the extent of the estate and recognise its importance. Where relevant, make reference to the estate.
Section 11.5.5	v. This map is confusing and referenced incorrectly. In the text of section 11.5.2.3 it is referenced as 11.8 but is actually 11.7 in the document. It is also unclear whether this map is intended to represent the total extent of irbyana TEC in the study area or just what is allegedly being impacted. Is there a map of the total irbyana defined in the study area within the document? This does not appear to exist within Appendix K either	v. The proponent must clarify this point on correct the figure headings. Add in a map of all irbyana mapped within the study area and make it clear which of this is actually being impacted.
Section 11.4.5.1	w. Core habitat of Marsdenia coronata has not been adequately estimated. This species is far more common than the surveys suggested, particularly through the Teviot Range. The entire Flinders-Karawatha Corridor should be considered core habitat for the species. It is noted in figure 11.2d on page 11-35 that chainage 40-42 and part of 44 have no flora survey points. This is likely to be some of the best habitat for the species in the alignment	w. The proponent must update and remodel the core habitat for the Marsdenia coronata and chainage 40-42-44 be surveyed for M. coronata

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Table 11.26	x. While Cupaniopsis tomentella (Boonah tuckeroo) is mainly found within remnant and regrowth vine forest it is also frequently found in margins and gulleys in this area particularly after fire. At various spots around Mt Elliot and Flinders Peak the species has been seen in thick regrowth clumps that are germinating after fire (Redleaf Environmental 2020). Given a cool burning wildfire went through a lot of this area in 2018 there is potential that the species could be located within the alignment	x. The proponent must undertake a targeted survey through the Teviot Range section of the alignment, particularly near Dungadan Creek. Note the species can be confused with Alectryon tomentosa if not familiar and care should be taken.
	y. As above chainage 40-42 and part of 44 have no flora survey points. This is likely to be some of the best habitat in the alignment that is being directly impacted. It is noted that figure 13d has noted that opportunistic surveys were undertaken but these still do not replace targeted flora surveys	y. The proponent must survey all of Chainage 40-42-44 for threatened flora.
Table 11.26	z. Recent surveys conducted by ICC and Wildlife Preservation Society of Queensland have located an important population of greater gliders at the base of Flinders Peak and connecting to Mt Elliot. Similar habitat extends all the way from Flinders Peak southwards to the project area. The EIS's assessment of impacts to the greater glider is not following the precautionary principle and makes general assumptions that are likely to greatly underestimate the potential impact to the species. Greater gliders are far more prevalent that most literature suggests and the only way to confirm presence is with detailed surveys. They can still be found in young forests as long as there is some hollows in the area for them to move to and from. The definition used for habitat critical to the survival of the species is inadequate	z. The proponent must undertake targeted surveys for greater gliders particularly within the Teviot Range. This includes detailed surveys with multiple repeat efforts. The estimate of impacted habitat are required to be reassessed and a more realistic estimate of habitat critical to the survival of the species is necessary, especially given the impacts to the species in the 2019-2020 bushfires and the fact that any impact of this species will be irreversible.

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	and makes broad assumptions about the presence or absence of the species with inappropriate levels of survey effort to back the definition. In addition the species is also highly susceptible to secondary disturbance from light and noise so the tunnel is also likely to have a major impact despite retaining habitat connectivity.	
	aa. There is a critical flaw in the assessment of proposed impact to grey-headed flying-foxes. The habitat modelling correctly includes both remnant and regrowth vegetation containing preferred winter foraging species. However the assessment only considers impacts to occur within 15km of a known roosting site. This is a flawed estimate and not in line with contemporary literature around the species mobility and foraging patterns. Flying foxes frequently forage more than 40km from a roost and also make migratory movements of more than 100km per night. These migratory movements are not in straight lines, and often involve stopping and feeding between camps	aa. The proponent must adjust the models for habitat critical to survival of the species to include all habitat within 100km from a known or historic roost.
	bb. Mentions the use of baiting to control wild dog predation on Spotted-tailed Quoll. Appropriate and by-catch impacts. Council is not supportive of this approach.	bb. The proponent must amend the management plan and utilise an alternate approach to prevent predation on the Spotted Quoll.

Air Quality

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
Chapter 12, Appendix L	**Tank Water – Grain/Cotton/Coal Dust Impacts** a. As the majority of properties impacted by this project are located on rural land, reticulated water supply may not be available. The primary source of drinking water for these residential premises is domestic water tanks that rely on rainwater collected from roof run-off to fill them and could be impacted by dust from the new rail line.	a. The proponent must provide additional assessment on the impact of dust on drinking water of rural homes. And if required provide appropriate mitigation measures to prevent health hazards.
Chapter 12, Appendix L	**Odour Impacts** b. The air quality reports do not appear to adequately account for the odour or dust impacts from desiccated manure blown off loaded or empty livestock wagons	b. The proponent must revise the assessment to account for the odour or dust impacts from desiccated manure. Any sensitive receivers to the impacts of odour are to be identified and mitigation measures proposed.
Chapter 12, Appendix L	**Q Fever** c. The air quality reports do not appear to adequately account for the effects *C. burnetii* (Q Fever) from contaminated airborne transmission or from desiccated manure blown off loaded or empty livestock wagons	c. The proponent must revise the assessment to account for Q Fever impacts from desiccated manure. Any sensitive receivers to the impacts of Q Fever are to be identified and mitigation measures proposed.
Chapter 12, Appendix L	**Tank Water – Grain/Cotton/Coal Impacts** d. The air quality reports do not appear to adequately account for the dust impacts blown off loaded or empty grain or cotton wagons, especially the impacts to water tanks.	d. The proponent should fully identify and assess the impacts to manage the potential dust impacts from blown off loaded or empty coal, grain or cotton wagons.
Chapter 11, Chapter 12, Appendix L	**Dust Deposition – Vegetation Impacts** e. The air quality reports do not appear to adequately account for potential dust deposition from livestock,	e. The proponent should fully identify and assess the impacts to manage the potential dust

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	coal, grain or cotton wagons, so that they will not adversely affect the health of ecologically sensitive vegetation.	deposition from the trains so that they will not adversely affect the health of ecologically sensitive vegetation including aquatic habitat. Practical mitigations measures such as vegetated wind breaks can reduce the concentration of dust moving laterally into native vegetation.
Chapter 12, Chapter 13, Chapter 14, Appendix L	**Dust Deposition – Water Quality Impacts** f. The air quality reports do not appear to adequately account for potential dust deposition from livestock, coal, grain or cotton wagons, so that they will not adversely affect surface and / or ground water quality	f. The proponent should fully identify and assess the impacts to manage the potential dust deposition from the trains so that they will not adversely affect the surface and / or ground water quality.
Chapter 12, Appendix L	**Intrinsic Value – Indigenous Heritage Sites** g. The air quality reports do not appear to adequately account for the impacts to the Intrinsic Value of Indigenous Heritage sites. “Intrinsic Value” is a much less tangible value of heritage. It typically involves the perceptions of individuals as to how a heritage property contributes to the basic and essential elements of a local community. The presence of these values helps form the identity of an area and the people that live within it. The existence value or inherent value of heritage is firmly embedded in a building and / or site’s identity, uniqueness and significance.	g. The proponent should fully identify and assess the impacts to the Intrinsic Value of all Indigenous Heritage sites to manage the air quality and odour Issues

Surface Water Quality

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
Section 13.3.3	a. Bremer River Water Quality Objectives (WQO) are currently under review by DES and potentially will be updated.	a. The proponent must update the surface water quality assessment to achieve the latest WQOs for the Bremer River Catchment.
Section 13.4.1	b. The EIS fails to account for on-going monitoring of water quality during the operation C2K.	b. The proponent must development a management strategy that monitors water quality during the operation of the project and account for remediation measures required to maintain the WQOs of the Bremer River catchment.
Section 13.4.1.1	c. The EIS states that *'Sites targeted watercourses that cross the proposed alignment, with additional sites located upstream and downstream of the alignment crossing'*. This appears contradicted by Appendix M- Surface WQ Tech Report and Figure 13.1 which only identify a single monitoring site in Western Creek, Bremer River, Warrill Creek and no WQ monitoring site at the major crossing of Purga Creek.	c. The proponent must meet the outlined methods by monitoring upstream and downstream of existing sites and consider in the short term a second site downstream to detect an impact to surface WQ if one is to exist.
Section 13.5.3.2 & 13.5.3.3	d. Table 13.11 and 13.12 indicate many sites were dry at the time of sampling, with some of the sites only sampled once out of the three baseline monitoring rounds. This makes it difficult to build a temporal trend in data. Although most waterways were currently degraded and not meeting WQO's for many parameters, the baseline data for some sites is scant and may make detecting future impacts difficult or vague.	d. The proponent must amend the surface water quality assessment to include more permanent reaches that are reliable for taking water quality samples.
Section 13.6.1	e. The EIS states *'Potential surface WQ impacts will be avoided or minimised through initial mitigation through design responses…'*	e. The proponent must ensure that works associated with construction on ephemeral waterways occur during dry periods.

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
Section 13.6.1	f. The EIS states *'Wastewater quality involving TSS, Phosphorus, and Nitrogen via MUSIC modelling of alignment drainage, indicates that impacts to rural areas associated with potential stormwater discharges are expected to be negligible with buffering from swales producing discharge of a better quality (reduced concentrations) than typical for rural areas'*. This is considered vague and unsupported (is this on site or off-site wastewater?), no evidence in Appendix M other than MUSIC modelling was used to conclude this. Furthermore, simply being 'better quality than typical for rural areas' is insufficiently ambitious and does not outline if this meets any relevant legislative objectives.	f. The proponent must quantify expected values of both onsite and off-site wastewater parameters and provide clarity on how it is expected to be 'better quality than typical for rural areas' in an amended surface water quality assessment.
Section 13.6.1.1	g. Erosion and sediment deposition from runoff into Ipswich waterways is one of the greatest surface water quality risks of the proposed project.	g. The proponent must implement an Erosion and Sediment Control Plan in accordance with IECA guidelines and standards.
Section 13.7.1	h. The EIS Table 13.24 states *'The design has been developed to avoid the need to permanently divert watercourses…'*. Despite stating that it refers to mapped waterways, this statement seems somewhat misleading as section 13.5.2.2 identifies five unmapped waterways that will need to be diverted.	h. The proponent must ensure that watercourses are not diverted.
Section 13.7.1.3	i. The EIS States *'In the event that Water Quality Objectives cannot be achieved for receiving waters, alternate treatment/ disposal options as adaptive management actions are to be implemented …'* Water treatment plants are also mentioned here, and it is recognised they will need to be of sufficient size to hold the required volumes of water.	i. The proponent is required to provide clarification on the sizing of water treatment plants and adopt this into the final design.

Hydrology and Flooding

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
Independent Flood Review Panel	**Independent Flood Review Panel Comments** a) The Independent Flood Review Panel highlighted multiple short fallings of the EIS flood study.	a) The proponent must incorporate the recommendations put forward by the Independent Flood Review Panel
Appendix N – Section 8	**Hydrology** b) The hydrology utilised for the EIS study has adopted hydrology information from the Brisbane River Catchment Flood Study (BRCFS), 2012. Specifically Intensity-Frequency-Duration (IFD) rainfall data that has been proven to underestimate flows by the Ipswich Rivers Flood Studies Update, 2019. Review of the current report appears to indicate that the underestimation has been considered to some degree. ARTC design flows at the Walloon gauge are still notably below BRCFS FFA (and Council's) flow values while the issue at the Amberley gauge has been improved through the application of factored BRCFS flows. This approach overall appears inconsistent as a result.	b) The proponent must update the hydrology for the Bremer River and ensure that the design flows match that determined by the Ipswich Rivers Flood Studies Update, 2019.
Appendix N – Section 9	**Flood Impact Results** c) Significant flood impact occurs along Waters Road and Kuss Road of magnitude up to 80mm. This change in flood level is unacceptable to ICC as the roads serve as the sole evacuation route for the affected community.	c) The proponent must either: i. Maintain the existing flood levels on Waters and Kuss Road by incorporating changes into the proposed design. ii. Engage with the affected community to raise awareness among community members as to the change in flood conditions.

Noise and Vibration

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
	a. The design and implementation of noise mitigation measures required to meet noise levels, are the responsibility of the proponent. However the long-term effectiveness of noise mitigation strategies and measures is likely to be dependent on implementation of an effective ongoing maintenance and management plan.	a. The proponent must provide an Ongoing Maintenance Management Plan with relation to noise mitigation measures to ensure that the long-term impacts of operational noise are mitigated.
	b. The acoustic reports submitted state that the predicted noise emissions from the rail operational use have been determined to exceed the adopted noise limits at the 65 nearby sensitive uses (residences) along the Calvert to Kagaru corridor.	b. The proponent must incorporate design features into the C2K to limit noise emissions to acceptable noise limits.
	c. The list of sensitive receptors appears to be limited to buildings which excludes camping facilities within the study area and so does not appear to be adequately comprehensive.	c. The proponent must assess the impact to all sensitive receptors in the study area.
	d. The acoustic report has indicated that the proposed standard construction hours of operation, including construction traffic, will be 7.00am-6.00pm Mon to Fri and 8.00am to 1.00pm Sat. However the Environmental Impact Statement, Chapter 23, states that there will be construction activities outside these hours.	d. The proponent must ensure consistency between the EIS documentation and must amend the acoustic report if required. The Proponent should fully identify and implement strategies to manage the residents impacted by all types of construction work at all times of the day for the duration of the project. Considering that the majority of sensitive uses are on agricultural land, they potentially cannot be relocated to other premises at night due to their location and the

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
		availability of alternative temporary accommodation
	e. The acoustic reports do not appear to adequately account for the impacts of noise on fauna. The rail corridor location will potentially impact 33 existing threatened wildlife, including Koala and Brush Tailed Rock Wallaby, which are both listed as vulnerable under the Environmental Protection and Biodiversity Conservation Act 1999.	e. The proponent must provide assessment on the noise impact caused to fauna during operation of the C2K. The assessment must include (but not limited to) the koala, black cockatoo and Rock Wallaby. The proponent must fully identify and implement strategies to manage the potential noise and vibration impacts to fauna (including edge impacts). The Proponent must demonstrate the Acoustic Quality Objectives for any Protected or Critical Areas including edge impacts are assessed. The Qld Environmental Protection (Noise) Policy 2019 identifies a Protected Area or Critical Area as a sensitive receptor and identifies the noise quality objective to be achieved as, "the level of noise that preserves the amenity of the existing marine park".
	f. There is no indication within the various acoustic reports that an assessment of the noise impacts on farm animals in support of the proposal was conducted. The rail corridor location will potentially impact a number dairy, cattle, poultry and horse breeding/training farms.	f. The Proponent should fully identify and implement strategies to manage the potential noise and vibration impacts to these animals.
	g. The acoustic reports have conducted measurement parameter to the façade of the residential buildings, as they have identified these as the sensitive uses. This	g. The Proponent should fully identify and implement strategies to manage the potential noise impacts to ensure that outdoor spaces of

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
	potentially quarantines the existing and future use of the land between the building and the boundary of the rail corridor. The Qld Operational Railway Noise and Vibration Guideline 2019 identifies a sensitive land use to include outdoor spaces of the residence as a noise criteria for new rail lines to achieve. It states that this criteria must be achieved for a minimum of 2000m2 or if the outdoor area is smaller than 2000 m2, the whole area.	the residence achieve the noise criteria for new rail lines for a minimum of 2000m2, or if the outdoor area is smaller than 2000m2, the whole area.
	h. The reports have assessed the predicted noise levels of the new rail development for the project opening in 2026 and also for the expected rail volumes over an indicative period into the future (in this case 2040). Future growth in rail vehicle volumes have been taken into account in noise monitoring. The reports state that 59 sensitive receptors will be impacted at project opening and further 6 by 2040. It is not clear if the Proponent will mitigate the noise impacts for all 65 sensitive uses at the project opening or progressively mitigate these properties.	h. Consideration must be given to mitigate the noise impacts for all 65 sensitive uses at the project opening at 2026.
	i. The acoustic reports do not appear to adequately account for the effects of varying topography and source-receiver geometry on noise propagation from the proposed rail line or adverse meteorological effects. It appears that the noise propagation calculations, and recommendation for management controls, have been made based on noise propagation over flat ground. The	i. The proponent must amend the acoustic report to account for the impacts of varying topography. The proponent must fully identify and implement strategies to manage the potential of the variation of noise levels due to the effects of sound reflection and meteorological effects.

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
	effect of this omission may be an under-prediction of noise impact levels on adjacent residential receivers. The Qld Operational Railway Noise and Vibration Guideline 2019 identifies a requirement to identify variation of noise levels due to the effects of sound reflection and meteorological effects.	
	j. The reports have indicated that due to the location of the sensitive users (mostly rural), it will not be feasible to install acoustic barriers within the rail corridor. The reports have recommended that fixed noise mitigation measures should be installed on impacted private property outside the rail corridor (such as upgrading property boundary fences, or architectural façade treatments such as double-glazing). The Proponent did not provided details of what would be required to upgrade a property boundary fence so that it will screen rail noise. Generally this would require a solid acoustic barrier of a certain height, which considering that the location as mostly rural, may not be suitable. Further, once constructed who will be responsible for the maintenance of this infrastructure, considering the various potential threats to these barriers such as from a bush fire.	j. The Proponent should fully identify, describe and implement strategies to ensure that all the fixed noise mitigation measures are installed at impacted private sensitive uses, at the project opening at 2026. And that a plan is in place to maintain the infrastructures integrity at the cost of the proponent.
	k. The engineering reference design train volume (peak) in the business case is for 418 train per week for 2040, which equates to an average of 60 train movements a day. However the acoustic report has modelled an average of 51 trains per day using this line by 2040	k. The proponent must ensure consistency between the EIS documentation and must amend the acoustic report if required.

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
	Impacts of Noise on an Indigenous Heritage Site l. The acoustic reports do not appear to adequately account for the impacts to the Intrinsic Value of Indigenous Heritage sites. "Intrinsic value" - is a much less tangible value of heritage. It typically involves the perceptions of individuals as to how a heritage property contributes to the basic and essential elements of a local community. The presence of these values helps form the identity of an area and the people that live within it. The existence value or inherent value of heritage is firmly embedded in a building and or site's identity, uniqueness and significance.	l. The Proponent should fully identify and assess the impacts to the Intrinsic Value of all Indigenous Heritage sites to manage the potential noise from the trains.

Economics and Social

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
Chapter 16, Chapter 17	**Intermodal Terminal** a. The current content of both Chapter 16 (Social) and Chapter 17 (Economic) do not consider the full scope of Inland Rail operation which is likely to include an intermodal terminal within the study area. The current content does not consider an intermodal's impact but instead broadly suggest that Inland Rail could be beneficial to social and economic development by facilitating industrial land uptake and associated undefined employment generation. The facilitation of industrial land uptake, particularly at Ebenezer Regional Industrial Area, relies on an intermodal terminal. EIS key findings that the project will support regional and local economic development is diminished without a catalyst to industrial land uptake and employment generation. An intermodal at Ebenezer is critical to securing local benefit to the Ipswich community, as outlined by the objectives of the proponent, but also may intensify negative impacts. If Inland Rail was to eventuate without an intermodal terminal at Ebenezer it is possible that the Ipswich LGA would experience an increase in road freight task from industrial precincts towards other intermodal terminals. This would increase the impact to the LGA's roads, safety outcomes and amenity for residents both inside and outside of the study area outlined in the EIS. b. Reference documents will be updated e.g. Advance Ipswich and the 2016 census	a. i. The proponent must revise reporting to explore the potential negative and positive impacts of Inland Rail considering its full operational scope which is likely to include an intermodal terminal within the study area, possibly at Ebenezer. ii. To assist in this, Council has provided the Willowbank Intermodal Social and Economic Benefits and Impacts Study, 2020, which outlines the social and economic benefits and impacts of an intermodal in the vicinity of Inland Rail. b. The proponent must update Social Impact Assessment with updated reference documents

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
	c. Council welcome the suggested involvement of Council in the monitoring and review of the Social Impact Management Plan (SIMP), as well as involvement in the development of a Community Wellbeing Plan and AMP as outlined	c. The proponent must include the following in the Social Impact Management Plan: i. Quarterly reports prepared by the contractor regarding stakeholder and community engagement. (stakeholder and community engagement plan). ii. Quarterly reports on the contractor's construction employment register/percentage of personnel employed locally and local procurement outcomes. iii. Updates provided to the ICC Tourism Team regarding monitoring of changes to event attendance or demands on tourism accommodation.
	d. The measure to address 'exposure to construction noise or vibration from laydown areas or bridge construction sites may affect the wellbeing and/or lifestyles of households near the Project footprint' and the Proponent will communicate with landowners within 250m of laydown and bridge construction sites and monitor complaints from residents in these areas	d. The proponent must communicate with landowners at a greater distance from work sites
	e. A Grievance Procedure will be developed	e. The proponent must provide Council with opportunity to review and provide feedback on the Grievance Procedure for complaints management/ongoing complaints management.
	f. Reliance on Queensland Police Service data to change a Traffic Management Plan is not adequate. This will not cover near misses.	f. The proponent must analyse community complaints to identify improvements to Traffic Management Plans, including at level crossings.

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
	g. No cumulative construction noise impacts have been identified at Willowbank	g. The proponent must undertake regular review of construction projects and impacts at Willowbank
	h. Proponent will consult with Ipswich Tourism Operators Network annually to identify any decreases in visitation established as attributable to the project.	h. The proponent must undertake more frequent consultation, and criteria for assessment developed, including what documentation will be required for any claim
	i. An estimated 16 households within the EIS investigation corridor in the Ipswich local government area will need to relocate to enable the project's construction. SIMP states access will be available to support services and potentially additional funding from ARTC.	i. Proponent must provide support to vulnerable residents who need to relocate
	j. Potential safety risks of creating new rail corridor	j. Proponent must provide rail safety awareness campaigns

Traffic, Transport and Access

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
1.	**Traffic / Route Assessment** a) The haul routes associated with construction of the C2k has yet to be confirmed. Traffic volumes and resulting impacts will be subject to significant variation, depending on the haul routes chosen by the Proponent. **Baseline Traffic Volume** b) Baseline traffic volumes utilised for the traffic assessment for a number of Ipswich Council roads are based on data up to 10 years old. **Construction Access Roads** c) Council have concerns with a number of proposed construction access roads: i. Coopers Road (Ebenezer Road to Cunningham Highway) – There are a number of residential properties in proximity to Coopers Road, particularly towards its eastern end, Significant volumes of construction traffic on this route, will create amenity issues for the nearby residents. ii. Champions Way (Cunningham Highway to Paynes Road) – There are concerns regarding the existing geometric constraints and the suitability of the existing pavement to accommodate the potential construction traffic for this section of road. iii. Ripley Road (Cunningham Highway to Edwards Street) – It is noted that this section of Ripley Road currently functions as a sub-arterial road, however it is expect that there may be amenity issues / concerns for residents that live along this section of road,	a) The proponent must revise the route assessment once the haul routes have been confirmed and ensure the applicable road network meets an appropriate performance standard. b) The proponent must complete updated traffic counts and revise the assessment prior to construction. c) The proponent must complete the following in relation to parts of the proposed construction access route. Any changes to the access route must be reflected in a revised traffic assessment. i. Coopers Road – The proponent must review the impact of increased traffic volumes on amenity (including limiting night-time work), if amenity impairment is unacceptable, the proponent must determine an alternate route. ii. Champions Way – The proponent is required to upgrade the geometric layout of the road and pavement or is to utilise an alternate haul route during construction. Council's preferred option is for access to be through State Development land to south of the Willowbank Motorsports Precinct.

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
	depending on the volume and time of day for construction / delivery vehicles. iv. Edwards Street (Ripley Road to Briggs Road) – It is noted that this section of Edwards Street currently functions as a sub-arterial road, however it is expect that there may be amenity issues / concerns for residents that live along this section of road, depending on the volume and time of day for construction / delivery vehicles. v. Macalister Street (Moffatt Street to Park Street) – This section of Macalister Street is fundamentally a residential street. vi. Park Street (Macalister Street to Warwick Road) – This section of Park Street is fundamentally a residential street **Road / Rail Crossings** d) Council have identified a number of issues associated with the C2K crossing within Ebenezer.	iii. Ripley Road – The proponent must review the impact of increased traffic volumes on amenity (including limiting night-time work), if amenity impairment is unacceptable, the proponent must determine an alternate route. iv. Edwards Street – The proponent must review the impact of increased traffic volumes on amenity (including limiting night-time work), if amenity impairment is unacceptable, the proponent must determine an alternate route. v. Macalister Street – The proponent must clarify the proposed trips types that would use Macalister Street, and determine alternate haul routes that avoids heavy vehicle use of Macalister Street. vi. Park Street – The proponent must clarify the proposed trip types that would use Park Street and determine alternate haul routes that avoids heavy vehicle use of Park Street. d) The proponent must provide a grade separated crossing (road under rail) within Ebenezer (to the west of the Cunningham Highway at the proposed Ebenezer Creek rail bridge) to accommodate the future north-south industrial arterial road connection. This crossing shall be suitable to ultimately accommodate a 4-lane dual carriageway industrial arterial road, with a minimal vertical clear of 6.5m.

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
	e) The Middle Road crossing is currently shown as a level crossing, which is not supported by Council.	e) The proponent must provide an alternate design to the proposed level crossing provided at Middle Road Crossing.
	f) There are a number of minor Council roads that will likely see on-going increased traffic volumes following the completion of the Inland Road corridor construction, due to the closure of existing alternate access roads.	f) The proponent must construct new local roads and upgrade existing Minor Council roads to an appropriate standard as part of the Inland Rail project, to remove the need for level crossings at Hayes Road, M Hines Road and Glencairns Road.
	General Traffic Impacts During Operation g) There are a number of rural roads (Coveney Road, Hayes Road, Lane Road, Middle Road, Old Grandchester Road, Reillys Road, Strongs Road, T Morrows Road, Waters Road – Refer Chapter 19 Traffic, Transport and Access - Table 19.21), that will be subject to a significant short-term increase (>50%) in daily traffic volumes during construction that will potentially create operational or safety issues.	g) The proponent must carry out road upgrades that will adequately support the increased traffic associated with the construction of the C2K.
	h) The Traffic Assessment has not considered the high frequency of trains passing and the cumulative impact on traffic delays at rail crossings.	h) The proponent must undertake additional assessment of traffic delays considering cumulative impact of frequently passing trains during peak traffic times, and also give consideration to impacts on services times for emergency service vehicles.

Emergency Management

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
Section 20.7.1 Section 20.7.2.2 Table 20.9 Section 20.9.4.4	a. The EIS fails to mention the impact of severe storms, hail events or destructive winds on the C2K. b. The report acknowledges alterations caused by the C2K to road traffic will impact on emergency services' ability to respond in the case of an accident during the construction and operational phase of the project. c. The risk table does not include bushfire risk caused by lightning strike. Often in Ipswich City Council Bushfires are caused by lightning strike and should be referenced in the EIS. d. The EIS mentions consultation with Ipswich Local Disaster Management Group	a. The proponent must provide discussion on the impacts of severe storms, hail events or destructive winds and list relevant mitigation strategies to prevent adverse weather impacts. b. The proponent must undertake community consultation with emergency service providers to ensure they are aware of road closures detours c. The proponent must amend the hazard risk table to include lightning storms. d. The proponent must provide evidence of consultation with the Local Disaster Management Group occurring.

Waste and Resource Management

SECTION	DESCRIBE THE ISSUE	SUGGESTED SOLUTION
	a. Community members have expressed concerns that the Inland Rail project will be used to enable the establishment of new waste management facilities in the Ipswich Region.	a. The proponent must identify proposed freight categories.