

Our Ref: JCD:RMJ
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Major Projects Team
Department of Planning, Industry and Environment
Via the NSW Planning Portal



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Dear Max,

**RE: JUNE SHIRE COUNCIL SUBMISSION TO PREFERRED
INFRASTRUCTURE REPORT**

June Shire Council wishes to thank the Department for the opportunity to provide comment on the Preferred Infrastructure Report (PIR) for the Albury to Illabo section of the Inland Rail Project.

Council has provided a submission in the attached table, outlining Council's comments and feedback to date (Items 1-25), as well as incorporating new comments towards the bottom of the table (Items 26-43).

Council is particularly concerned about the potential new acoustic mitigation measures that are contained in the PIR, being the installation of a significant noise barrier through the centre of June. Council and the community strongly oppose the installation of this piece of infrastructure with major concerns around the visual and amenity impacts to a historic and rural centre such as June, as well as the overall long-term management of the barrier, especially in relation to graffiti and other anti-social behaviour.

Council also wishes to express concerns that the level of impact to through traffic as a result of the now extended construction period of the Kemp Street Bridge has not been adequately considered by the submitted traffic study. Delays at the June Olympic Highway Level Crossing are currently extensive as a result of current rail operations, and the closure of the Kemp Street Bridge will further exacerbate this issue.

Council would like to thank Inland Rail for the inclusion of a Disability Discrimination Act (DDA) compliant pedestrian access bridge as part of the Kemp Street Bridge upgrade and look forward to having further conversations and providing feedback in relation the future detailed design of that infrastructure.

Council welcomes any future opportunity to provide feedback in relation to the Inland Rail project.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "James Davis", is written over a blue circular stamp.

James Davis,
General Manager

Junee Shire Council assessment		A2I EIS response	Junee Shire Council comments on EIS	Junee Shire Council PIR and RfS Comments	Recommendations
Item 1: Council SEARs request 31 July 2020	<p>Train Movements</p> <p>Junee Shire Council (JSC) sought greater detail and assessment of the impact of increased rail movements, particularly in Junee township. Section 1.2.3 Operation stated current movements were "estimated" at 13 trains per day increasing to 24 trains per day by 2040. Junee requested more certainty and analysis of these "estimated" movements to inform the potential impacts (e.g., noise, vibration, level crossing safety, traffic, economic).</p> <p>The metric of movement numbers is limited in its application and interpretation. The length and speed of the movements needs to be accounted for in any assessment of impact. For example, 11 additional movements to the 13 daily movements is an 85% increase (almost doubling) in movements. Speed is another factor in the impact equation and there is some inference that the speed may reduce thereby further increasing the duration of impact.</p>	Not addressed	<p>The EIS indicates an increase in 12 trains per day in 2021, 18 per day in 2025 and further increasing to 20 per day in 2040. The total daily number of trains has decreased from a peak demand of 24 (Inland Rail Albury to Illabo Scoping report 2020) to approximately 20 (A2I EIS) in 2040 without explanation. This represents a 20 % differential in train movements at the level crossing located 50m to the north of the Junee Railway Station.</p> <p>Recommendations: The proponent be required to provide a detailed assessment of why the estimated total number of trains has been reduced from 24 to 20 by 2040. The proponent should also provide details on the maximum number of movements permitted by the upgraded infrastructure expected per day, i.e., are these movements artificially capped?</p> <p>JSC retains the view that the increase in the total number of trains 1800m long, combined with the speed of train travel, may significantly impact the road and pedestrian interface at some level crossings more than others. JSC has raised particular concerns with the proponent regarding the level crossing at the Junee Railway Station since 2019, calling for a comprehensive traffic study that would consider a range of the impacts at this crossing.</p> <p>The EIS has taken a generic approach to level crossing activation within the A2I section to assess the level of additional impact and inconvenience to all communities along the A2I section. The EIS applies a one size fits all calculation applying a maximum train length of 1800mm and a travel speed of 80km/hr to arrive at signal activation time. While the EIS refers to those estimates being impacted by any other track regulated speed controls, JSC made the proponent aware of matters that specially impact the level crossing at the Junee Railway Station level crossing and called on the proponent to analyse the extent of those impacts. Without such information the Council is not satisfied the level of impact can be appropriately considered within the EIS.</p> <p>Recommendations: That the proponent undertakes and provides a detailed analysis assessing the impact of the level crossing activation at the Junee Railway Station. The analysis should include all standard and current railway movements impacting the level crossing, including freight and passenger train movements, shunting movements, and train driver changeovers as conducted currently. Projected movements out to 2040 should be included in the analysis, noting the increase in frequency of those train movements to establish accurate road and pedestrian cumulative impacts at this location.</p> <p>Council also requires alternate arrangements be made to minimise the impacts of train driver changes on the level crossing whilst the Kemp Street bridge is closed to minimise time delays.</p>	<p>RfS: Satisfied, scoping proposal included passenger services.</p> <p>RfS: Did not address train driver changes and impacts to existing level crossing. No solution reached.</p> <p>PIR: Further detail should be provided around level crossing activations and the length of these closures across LX607 (Olympic Highway at Junee).</p>	<p>The estimated maximum vehicle queue length at the Junee level crossing increase does not reflect what Council experiences. See Items 36 - 39, below. The level of impact to travel times does not correlate with local experiences where the level crossing is closed for up to and exceeding 10 minutes during certain rail operations.</p>
Item 2: Council SEARs request 30 July 2020	<p>We noted the Kemp Street bridge will need to be raised by some 2m which will negatively impact pedestrian gradient approaches. The critical matter of disability access on both sides of the bridge is of concern to the Council. Council requested the SEARs include provision for an option designed study with alternative disability access; particularly of the eastern side approach is requested. The Council previously proposed an alternative solution to ARTC that JSC requested be considered in the EIS.</p>	Addressed	<p>JSC has held positive discussions in recent times with the proponent with respect to pedestrian access at the Kemp Street bridge.</p> <p>The proponent is now proposing a separated pedestrian and cycle footbridge fully compliant with DDA and accessibility standards. The proposed location is just to the north of the current Kemp Street bridge. Statements of the proponent's intention have been expressed in the EIS. The proponent is consulting with JSC regarding suitable location and design which is appreciated. Council has taken significant measures recently to improve accessibility of Junee and any pedestrian access proposed for the Kemp Street bridge must reflect this community desire for improved accessibility.</p> <p>Recommendation: The intention reflected in the EIS regarding a separated foot and cycle footbridge to be fully compliant with DDA and accessibility standards to be included in any Notice of Determination.</p>	<p>PIR: Junee Shire Council wishes to thank Inland Rail for the amendment to construct a compliant independent pedestrian access bridge to DDA requirements at this location, it provides a valuable upgrade to the accessibility of Junee.</p>	Not required
Item 3: Council SEARs request 30 July 2020	<p>Requested the SEARs require the ARTC's Heritage Consultant contact the Council regarding items that may be of local historical interest if the existing Kemp Street bridge is demolished.</p>	Addressed	<p>The EIS refers to (27-7) The re-purposing of salvaged materials within the design of new road bridges for the following unregistered potential heritage items would be investigated during detailed design:</p> <p>Kemp Street bridge—red brick and streetlights.</p> <p>Council notes the commitment to gift the Junee pedestrian bridge to Council.</p> <p>Recommendation: The demolition and transportation of the existing pedestrian footbridge at the Junee Railway Station must be sympathetic to it being reused – disassembled in sections that can be easily reconstructed. Elements of the existing Kemp Street Bridge, such as the locally manufactured red brick and streetlighting should be retained where possible for adaptive reuse in consultation with Council.</p>	<p>RfS: Junee Shire Council wishes to thank Inland Rail for the inclusion of the unregistered heritage items to be salvaged for adaptive reuse for the Kemp Street Bridge.</p> <p>Council also thanks Inland Rail for their commitment to removing the existing Junee pedestrian bridge in a condition sympathetic to the bridge being repurposed.</p>	Not required

Item 4: Council SEARs request 30 July 2020	6.7.2.2 Socio-economic Council supports the inclusion of socio-economic assessment reports. Council would encourage preliminary meetings with each council of the affected communities to identify local socio-economic issues prior to the development of such reports. In Junee's case for example, we have a Correctional Centre that is designed to house up to 1500 inmates. This has unique socio-economic impacts on our community that may not be present in other communities. High importance needs to be placed on the impacts of traffic and pedestrian connectivity of Junee as well as business and economic impacts resulting from increased train movements and intermittent physical separation to either side of the Junee township. The Council strongly request the inclusion of a comprehensive traffic study for Junee be included with the SEARs. The confluence of specific items raised in this submission regarding traffic management issues in association with: - The importance of the Olympic Hwy as a regional traffic route and its localised position in the town of Junee with intersection constraints at the level crossing [Junee Railway Station]. - The importance of the Byrnes Road running parallel to the railway line on its eastern side linking Junee to Wagga Wagga and providing access to the Junee Abattoirs (300 jobs) and the proposed Wagga Wagga Special Activation Precinct at Bomen. - The Junee Correctional Centre with 350 staff. - The rail bridge with its low-level road underpass at the northern edge of Junee township placing limitation of oversized (height) vehicle movements.	Not addressed	Council notes the socio-economic assessment in the EIS does not specifically address matters related to the Junee Correctional Centre other than comments on workforce statistics. There are specific issues associated with having a correctional facility in a community, such as partners and their children travelling to Junee to visit inmates. Prior to Covid, visitor numbers were above 300 per week, placing pressure on local travel and available affordable accommodation. JSC requested the proponent address this specific issue within the EIS. The Correctional Centre has an inmate population of up to 1000, anticipated to be expanding to 1500. Therefore, particular analysis of the visitation issue was requested as part of the EIS, especially in relation to the socio-economic and workforce accommodation impact assessments of the proposal. Recommendation: The socio-economic assessment of the Inland Rail project be updated to include the Junee Correction Centre and related impacts of the proposal on the community in greater detail.	RTS: Not addressed, relies on formulation of a "workforce accommodation plan", while not detailing how the "very high to high" impacts of the A2I Inland Rail project will be mitigated.	Inland Rail should provide more detail in relation to the housing of the anticipated workforce in the region, noting the very high impacts to housing anticipated as a result of the project.
			The EIS (13-32) recognises that prior to closure of Kemp Street bridge, the proponent will investigate opportunities to reduce the duration of level crossing closures on Olympic Highway, Junee. The socio-economic assessment is strongly focused on the construction phase of the project. The legacy project outcomes after completion are not considered to have been adequately addressed in the EIS from JSC's perspective. JSC has consistently requested a comprehensive traffic study for the Junee township to adequately investigate the unique cumulative impacts of road and rail traffic movement through Junee and the consequences these impacts may have on residents and users of the Olympic Highway. From a post construction perspective, the proponent has selected to treat traffic matters of each individual construction project in the Junee township in isolation. JSC has already indicated in Item 1 its' position on how project outcomes will impact the level crossing at the Junee Railway Station with increased train activity activating the level crossing. The EIS analysis for increased activation time at this level crossing is flawed in Council's view as it appears not to have considered other train movement factors. Anecdotally, train driver shifts change-over at the Junee Railway Station from trains travelling from Sydney to Melbourne can keep the level crossing activated for 10 to 15 minutes. JSC holds concerns that the level crossing data used to inform the EIS may be of generic nature and not site specific, or it may only be looking at trains passing through without recognising shunting movements or the changing of train driver crews at Junee Railway Station. Recommendation: That further analysis by the proponent be undertaken and detailed analysis provided assessing the specific impact of the level crossing activation at the Junee Railway Station during the removal and construction of the Kemp Street bridge, as well as during the operation of the Inland Rail. This analysis should be inclusive of all current railway movements impacting the level crossing by freight and passenger train movements, shunting movements within rail precinct and train driver changeover in 2022 with projections out to 2040 noting the increased frequency of those train movements to establish the road and pedestrian cumulative impacts at that location.	PIR: Not adequately addressed. ADDITIONAL COMMENTS It appears as if the same assumptions and data have been utilised as contained in the EIS, which JSC fundamentally disagree with. Further detail should be provided around level crossing activations and the length of these closures. The estimated maximum queue length increases also seem not to reflect what Council would expect queue lengths to increase by. Additionally, the level of impact to travel times was similarly not reflective of real-world scenarios where this level crossing can be closed in excess of 10 minutes during certain rail operations.	Inland Rail should provide a more robust analysis of the level crossing activations and the length of these closures, especially when the proposed closure of the Kemp Street Bridge has been extended to 12 months. Council notes the microsimulation model considers increases in traffic loading, however, the basis for this microsimulation model contains extremely limited physical on-site data capture, see Items 36 - 39. We believe the base data capture and the underlying assumptions used to inform the model are inaccurate given the limited data sample.
Item5: Council SEARs request 30 July 2020	Fencing We note much of the existing rail corridor in Junee township is not fenced on both sides. The SEARs should request a review of safety and security associated with increasing use of the corridor to mitigate risks.	Not addressed	Recommendation: That the proponent addresses the need to provide adequate fencing to the rail corridor through the township of Junee at detailed design stage to address community safety concerns related to increased rail traffic movement.	RTS: Not addressed, Inland Rail will commit to only renewing existing fencing where impacted by the proposal.	The response is an unsatisfactory outcome from a JSC perspective
Item 6: EIS	Summary of Key Findings of the EIS	To be addressed:	Throughout the EIS, Construction Traffic Transport and Access Management Plans is proposed to be developed for each enhancement site prior to construction. To the best of JSC's knowledge, the EIS does not confirm these plans will be developed with the cooperation of local councils. Recommendation: That any Notice of Determination provides greater certainty for Councils being consulted during the preparation of Construction Traffic Transport and Access Management Plans.	RTS: Addressed, IR has committed to developing CEMP in conjunction with local Councils.	Not required
Item 7: EIS	Waste and Resource Management (Chapter 23)	Request	JSC may be able to accept reasonable quantities of waste at the Junee Landfill from project work occurring within the Junee LGA boundary. It will not be accepting waste material generated from outside the LGA boundary. Further consultation with JSC is recommended once more accurate quantities of waste are known to determine whether these amounts can be accommodated at the Junee Landfill. Additional clarification is also requested regarding the stockpiling of excavated material within the identified compound areas and whether the anticipated amounts of excavated material can be accommodated in these areas. Recommendation: The proponent undertakes waste disposal activities in consultation with Council, noting that Council will preference preserving landfill airspace for the local community. Further analysis should also be provided identifying the suitability of the identified construction compounds for the proposed quantities of stockpiled material.	RTS: Not specifically addressed, document commits to providing more detail in CEMP.	Not required

Item 8: EIS	Groundwater (Chapter 19)	To be addressed	<p>Council notes significant dewatering of the groundwater at the Kemp Street Bridge location is anticipated to be required, however no storage solutions are proposed as part of this EIS with further detail to be provided prior to construction. This is considered to be an inadequate approach to addressing this issue.</p> <p>Recommendation: That the EIS be amended to include options for storage of this groundwater in consultation with Council. Amendments should include an assessment of potential impacts of dewatering, such as additional heavy vehicle movements, potential impacts to existing stormwater infrastructure and any other relevant issues.</p>	<p>RtS: Addressed, no storage onsite of dewatered groundwater will be undertaken. EIS has accounted for and includes heavy vehicle movements to remove adequate amounts of groundwater from the site for disposal or storage offsite.</p>	Not required
Item 9: EIS	Transport (Chapter 3-12)	Misprint	<p>The paragraph:</p> <p>The proposal site crosses the Riverina Highway (Albury), and the Olympic Highway (Culcairn, Junee and approximately 2 km north-east of Illabo). These roads pass over and under the rail corridor.</p> <p>The crossing located 2km northeast of Illabo is a level crossing.</p>	<p>RtS: Satisfied, error noted.</p>	Not required
Item 10: EIS	Table 6-5 Options assessment summary - Junee (Chapter 6-14)	To be addressed	<p>Kemp Street Bridge: JSC informed the proponent of concerns it had relating to reconstruction of the approach roads (approx. 80 m long) on both sides of the Kemp Street Bridge Deck not being constructed to a compliant standard. JSC requests the design reflects this or Council concerns on this matter being reflected in the EIS. It is considered the EIS has not adequately included or addressed this request.</p> <p>Council considers the proposed works will have significant negative impacts on residential properties located directly adjacent to the Kemp Street bridge approaches, which have not been adequately assessed in the EIS. The increase in the overall height of the bridge and approaches are considered to directly impact these residences.</p> <p>Recommendation: Consideration should be given to purchase of affected properties if the owners are agreeable as part of the A2I project and returned to buffer/open space. The purchase of these properties would also enable the intersections either side of the bridge to be upgraded. These intersections are currently constrained and have been assessed as posing safety concerns, as outlined in the attached Junee Freight and Transport Plan – Draft Traffic Study Report.</p>	<p>RtS and PIR: Not addressed, RtS and PIR identify separate pedestrian bridge to achieve DDA compliance.</p> <p>ADDITIONAL COMMENTS Council remains concerned in relation to the proposed approach slopes for the Kemp Street Bridge being non-compliant with AGRD Part 3. However, IR have provided assurances that approach roads compliance with these standards will be considered at detailed design stage.</p> <p>Assessment on impacts on adjoining properties should not only rely on visual impact only, but overshadowing and overall amenity.</p>	Recommendation below, see item 28.
			<p>Council notes the A2I have committed to a DDA compliant separate pedestrian bridge crossing nearby to the Kemp Street Bridge. Council notes the open space at the Kemp Street bridge will be required to be reconfigured to accommodate the associated intersection.</p> <p>Recommendation: Council requires the landscaping of this space be completed to a higher standard, recognising the prominence of this location as an entrance point to CBD of Junee at the detailed design stage. Council also notes an opportunity for the adaptive reuse of certain heritage elements to preserve the heritage fabric of this location as part of these landscaping works.</p>	<p>RtS: Partially addressed, landscaping design to be developed further during detailed design.</p>	Not required
			<p>Olympic Highway Underbridge: Council retains an objection to the preferred outcome as lifting the bridge would improve road clearance to avoid future disruption to Inland Rail should there be road traffic collision with the structure at that location due to the low height for traffic travelling under it. JSC has drawn this matter to the attention of the proponent and TINSW (Transport for NSW), who appear to be accepting of such risk.</p> <p>Recommendation: The proponent should reconsider the preferred outcome to include road lowering in this location to increase clearance height under the bridge and reduce the risk of road traffic collision with this infrastructure.</p>	<p>RtS: Not addressed, IR identifies this outcome as being outside the scope of the project.</p>	The response is an unsatisfactory outcome from a JSC perspective

Item 11: EIS	Option Development and Assessment (Chapter 6-16)	To be addressed	<p>Opportunities for grade separation</p> <p>ARTC policy is that rail–road interfaces would be grade separated when there are level crossings with four or more rail tracks.</p> <p>The level crossing at the Junee Railway Station currently has 4 rail tracks at this crossing. The EIS does not appear to mention that this level crossing does not meet the ARTC policy for grade separation or the reason as to why it is diverging from this policy.</p> <p>JSC recognises graded separation is not practical at this location. However, an assessment of mitigation measures and options as to why the policy was not followed would have been helpful. It also draws more attention for the need to consider the JSC recommendations in item 1 and 4 of this submission.</p> <p>As a general comment the EIS has been understated in recognising this level crossing as the major level crossing within the Junee LGA (other than within the context of alternative traffic routes while the Kemp Street Bridge is under construction) when compared to other level crossings within the Junee LGA in the EIS. It does not appear to have been assessed against the ALCAM assessment criteria as have other level crossing. Nor has the EIS recognised the Council request for a detailed assessment at this location be included with the EIS</p> <p>Recommendation: Council requests further investigation and analysis into the operation of the Olympic Highway level crossing adjacent to the Junee Railway Station, including anticipated waiting periods due to driver changeover. Installation of appropriate driver change infrastructure should be considered as a mitigation measure to reduce wait times at this location, where grade separation cannot be achieved.</p>	<p>RtS: Not addressed, IR identifies this outcome as being outside the scope of the project. IR attempted to negotiate a solution to relocate train driver change infrastructure to reduce impacts to existing level crossing. No solution reached to date.</p>	<p>Council supports ongoing discussions with IR, ARTC and other relevant parties to resolve the issues relating to train driver change over delays at the Junee Olympic Highway level crossing.</p>
Item 12: EIS	Preferred Option (Chapter 6-16)	Information	<p>The EIS refers to Wornes Gate Lane level crossing throughout the EIS as Wornes Gate Lane (LX1472), indicating the crossing would be upgraded from a passive to active.</p> <p>JSC notes that Wornes Gate Lane on the southern side of the Rail corridor is an unformed public road. The proponent may wish to examine this further to avoid moving from passive to active controls on this level crossing.</p> <p>Recommendation: The proponent reviews the requirement for active controls at the level crossing at Wornes Gate Lane (LX1472).</p>	<p>RtS: IR preference to close this crossing, pending ongoing consultation with landowners, emergency services and State government agencies.</p>	<p>Not required JSC has the opportunity to consider this matter outside of the Major Project Development Application process</p>
Item 13: EIS	Preferred Option (Chapter 6-17)	To be addressed	<p>Council notes it is intended that the Carter property access road (LX605) will be upgraded from a passive to active level crossing and traffic movements will be limited to left in and left out at the Olympic Hwy. Council also notes it is intended to construct a concrete median to control vehicular traffic at the intersection.</p> <p>Recommendation: Council considers limiting traffic movements to left in and left out will create traffic hazards, with trucks undertaking U turns across the Olympic Hwy to access the Council owned quarry and the Carter property. The intersection with the Olympic Hwy should allow for all turning traffic and include adequate storage lanes for turning traffic. Upgrades to Brabins Road are recommended to facilitate suitable site access.</p>	<p>RtS and PIR: Addressed, track slewing proposed to accommodate level crossing in the location, with both left and right turn functionality.</p>	<p>Not required</p>
Item 14: EIS	Proposed features and operation (Chapter 7)	To be addressed	<p>The EIS indicates: Alternatives and proposal options. Any design modifications that occur as a result of matters arising during the exhibition of this EIS would be identified in a Preferred Infrastructure Report or Amendment Report.</p> <p>Recommendation: The proponent provides any Preferred Infrastructure Report or Amendment Report relevant to a particular LGA to those councils with sufficient time (21 days) to provide comment</p>	<p>RtS: Addressed, PIR provided to Council, with 21 day submission period.</p>	<p>Not required</p>
Item 15: EIS	Traffic and Transport (Chapter 9)	To be addressed	<p>The traffic data in the EIS refers to a maximum traffic volume of 2,590 per day with 33% heavy vehicles for Byrnes Road compared to Councils data which shows average daily traffic volume of 2,840 per day with 17% heavy vehicles.</p> <p>Recommendation: Council notes the traffic data included in the EIS differs to the data collected on behalf of Council in 2021 and should be reviewed.</p>	<p>RtS: Addressed, revised traffic counts conducted as part of PIR.</p>	<p>Not required</p>

		<p>Council notes the recommendation for the rectification of pavement were necessary to support diversion of vehicles from the Olympic Hwy to local roads in Junee.</p> <p>The road network in Junee is highly vulnerable to damage caused by changes to the flow of traffic and increases in traffic and heavy vehicular movements both during the construction phase and ongoing operation of the upgraded rail network. It is considered these impacts have not been adequately investigated or addressed in the EIS.</p> <p>It is critical the integrity of the broader local road network is considered prior to construction, and improvements are made to accommodate the A2I works and ongoing operations of the upgraded rail network. Rectifying damage post construction is likely to be more costly and impose additional cost to the local community and Council. This requires the roads to be assessed and preventative upgrades to the pavement and road surfaces to be completed prior to traffic diversions and haul roads being activated.</p> <p>The EIS recognises some preventative road works will be required to offset the impacts from increased traffic movements (including heavy vehicles) during construction but provides no detail on the extent or type of preventative road works that will be undertaken.</p> <p>Council notes Road Dilapidation Reports will be prepared for all haul routes within each precinct and ARTC has committed to rectification of damage caused during construction to restore the road to the pre-work condition.</p> <p>Recommendation: Assessment of the road network requires consideration of the broader road network to extend beyond the roads directly impacted during the construction phase. Dilapidation reports should include roads used for diversions and detours along with haul roads and incorporate assessments of the structural integrity and load capacity of the subject roads.</p> <p>Identification of roads requiring preventative upgrades, prior to the commencement of A2I construction works, to ensure the subject roads will withstand the changes in traffic movements and minimise risk of road failures and defects that require reactive repairs.</p> <p>The proponent should identify the need to undertake proactive road upgrades where applicable, instead of reactive repairs as increased traffic leads to road failure and dangerous conditions for residents and through traffic.</p>	<p>RTS: Partially addressed, some diversion routes were detailed suitable for light vehicles, but all diversion routes and necessary dilapidation surveys, condition assessments and road maintenance and upgrades for heavy vehicle detour routes should be listed to support the details contained in MIRDA and PIR.</p> <p>Limited details were provided around proactive road upgrades or proactive repairs and maintenance during the construction period where failures occur.</p>	<p>JSC acknowledges the additional proposed detour on Joffe Street and Pretoria Street, however, the previous recommendations stand for all other detour routes required for the project.</p>
		<p>Council considers the A2I project provides an opportunity to improve the broader local road network and the movement of freight in and around Junee in conjunction with the rail upgrade. The rail network passes directly through the township of Junee; however, the proponent has failed to consider the knock-on effects on the broader road network and the movement of freight in and around Junee. The opportunity to improve the rail/road interfaces outside of the rail corridor has been denied by the proponent. Council notes the proposal for the replacement of the Kemp Street Bridge will be upgraded to be able to accommodate heavy vehicle (HML) traffic, however this upgrade should also include capacity for future use by A-Doubles and Road Trains and upgrades to the adjoining intersections.</p> <p>Council funded and recently received the Junee Freight and Transport Plan – Draft Traffic Study Report to assess key network constraints, including the constraints posed by the rail network. The assessment identified fourteen locations where there are existing safety and/or operational concerns related to movement of freight and the operation of the rail network through the township of Junee. A summary of these concerns is outlined in the table below (Appendix 1). A copy of the Junee Freight and Transport Plan – Draft Traffic Study Report is also attached to this submission.</p> <p>Recommendations: The refinement of traffic detours for Junee and the development of traffic control plans for the detours should be developed in consultation with Council, and any diversions/detours associated with the local road network will be agreed with Council before being implemented.</p> <p>The Kemp Street bridge and associated intersections should be designed to accommodate A-Doubles and Road Trains.</p>	<p>RTS: Partially addressed, Council has been consulted in relation to the proposed Kemp Street Bridge design. Council continues to provides feedback on detailed designs.</p> <p>ADDITIONAL COMMENT: Council believes that Olympic Highway traffic, especially heavy vehicles, should be diverted via Old Junee Road if the traffic impacts during the construction of the Kemp Street Bridge cannot be satisfactorily mitigated.</p> <p>Consideration has not been made for suitable heavy vehicle detours during the project to reroute heavy vehicles from major arterial roads and/or reroute heavy vehicles during harvest and other peak operating periods. Junee Shire Council and Transport for New South Wales have established detour routes/plans for these situations including diversion of the Olympic Highway, Gundagai Road and Byrnes Road via Old Junee Road. A similar process should be implemented for the Kemp Street bridge works, as Joffree Street/Pretoria Street are not suitable for Heavy Vehicle Access. Alternatively, upgrades Councils network could be made to allow heavy vehicle access.</p>	<p>Suitable heavy vehicle detours should be detailed.</p> <p>The refinement of traffic detours for Junee and the development of traffic control plans for the detours should be developed in consultation with Council, and any diversions/detours associated with the local road network will be agreed with Council before being implemented.</p> <p>The Kemp Street bridge and associated intersections should be designed to accommodate PBS Level 3a vehicles.</p>
		<p>Council notes the EIS refers to some tree clearing to accommodate works and improve sight distances.</p> <p>Recommendation: Clearing/trimming within road corridors and public spaces outside of the rail corridor must be consulted prior to undertaking with Council.</p>	<p>RTS: Addressed.</p>	<p>Not required</p>

			<p>Council notes some on-street parking will be lost to the community during the construction phase.</p> <p>Recommendation: Parking for construction vehicles must be located off-street and not impact on the availability of on-street parking for residents and business parking.</p>	<p>RtS: Addressed, CEMP to detail parking arrangements further with Council consultation. Excess on street parking only anticipated to be required during rail possessions (2x90hrs per annum).</p>	<p>Not required</p>
Item 16: EIS	Proposal Features and Operation (Chapter 7)	To be addressed	<p>Recommendation: Proposed dust suppression seals at rail level crossings on gravel roads need to extend to 150m either side of the crossing as a minimum to be effective.</p>	<p>RtS: Partially addressed, extent of seal to be determined at detailed design stage.</p>	<p>Council will negotiate with IR during the detail design stage, recommending the requested 150m seal for existing gravel roads.</p>
Item 17: EIS	Economics (Chapter 14)	To be addressed	<p>Council is concerned the workforce demands of the project will cause negative impacts to the local workforce which is already experiencing the impacts of staff shortages. Council generally supports the use of local workers where appropriate, however the EIS has not adequately considered an employment scenario where there are no local workers available to furnish the required workforce.</p> <p>Recommendation: Council recommends sourcing materials/consumables from local businesses where possible to benefit local economies across the length of the project. Additional analysis of the workforce should be included where there are no local workers to furnish workforce requirements.</p>	<p>RtS: Partially addressed, the social impact assessment contained in the EIS considers that less than 10% of the workforce will be able to be sourced locally. This still implies that some work force will be available for uptake, where Council has requested a review of the social impact where no workers are available among the resident population and the implications this has on housing and residential accommodation in Junee.</p>	<p>Council recommends that the social impact assessment be updated to include the scenario where no local workforce is available to service the project and identify the additional accommodation impacts this might have for the project area, including Junee.</p>
Item 18: EIS	Noise and Vibration (Chapter 15)	To be addressed	<p>Council considers the approach taken in assessing potential noise impacts is not adequately able to draw conclusions regarding potential mitigation measures, especially to sensitive receivers such as educational facilities. Ground truthing exercises should be conducted at the EIS stage, especially at these locations and where significant exceedances of impact criterion occur.</p> <p>Recommendation: A more thorough Acoustic Impact Assessment be conducted that includes "ground truthing" exercises and measurements at sensitive receiver sites to identify and propose actual mitigation measures at these locations. A commitment to ongoing monitoring in these locations would also be recommended to ensure the mitigation measures proposed are effective over the ongoing life of the project.</p>	<p>RtS & PIR: Addressed, additional noise monitoring and assessment undertaken in PIR. Council acknowledges ongoing compliance monitoring will be undertaken to fully realise and mitigate noise and vibration impacts.</p> <p>Additional comments provided below on noise issues.</p>	<p>Not required see below for additional commentary on noise barriers in Item 42, below.</p>
Item 19: EIS	Hazards (Chapter 24)	To be addressed	<p>The risk of bushfire as a result of "hot works" is identified within the EIS as being a potential hazard. Council notes several projects within the LGA are proposed to be carried out within peak bushfire season, but no mitigation measures have been proposed to reduce the risk of bushfire or grassfire in these locations at these times.</p> <p>Recommendation: The EIS be amended to include appropriate mitigation measures for bushfire prevention, including rescheduling of hot works on days where "Stop Harvest" or similar notices are issued by RFS. Where works cannot be rescheduled, alternative fire protection measures should be proposed.</p>	<p>RtS & PIR: Addressed, consultation with RFS undertaken, CEMP will address procedures to undertake hot works during high fire danger periods.</p>	<p>Not required</p>
Item 20: EIS	Tech Paper 11 Hydrology, Flooding and Water Quality	To be addressed	<p>Recommendation: Council recommends the project provides an opportunity to undertake a drainage/flood assessment of the entire length of the project rail corridor to identify and resolve existing drainage/flooding issues along the rail corridor. This assessment should not be limited to the proposed works locations given the impacts of the project as a whole on future rail operations.</p> <p>The assessment should include interfaces with Council stormwater systems – George Street, Railway parade.</p>	<p>RtS: Not addressed, IR identifies this level of study as being outside the scope of the project.</p>	<p>Council recommends and supports the completion of this study to inform detailed design of stormwater management systems, particularly where IR is modifying existing infrastructure.</p>
Item 21: EIS	Appendix B – Strategic Planning Review	To be addressed	<p>Refers to the Future Transport Strategy 2056, but the proponent has not considered the broader aspects of this strategy – confined to the rail and direct impacts on the rail corridor only.</p> <p>Recommendation: The proponent addresses the Future Transport Strategy 2056 with a more integrated approach, considering the broader aspects of this Strategy.</p>	<p>RtS: Partially addressed, IR have identified relevant details of Future Transport Strategy: Our vision for transport in NSW in 2022 (Transport for NSW, 2022), which is considered to supersede the Future Transport Strategy 2056. Consideration of the plan has been limited to what IR defines as being "directly relevant to the proposal".</p>	<p>Not required.</p>
Item 22: EIS	Appendix D - Utilities	Clarification required.	<p>Council requests clarification that the sewer at Kemp Street will be relocated as part of the bridge replacement works.</p> <p>The submitted Appendix only refers to concrete encasement, contradicting previous discussions with the proponent regarding the impacted sewer mains.</p> <p>Recommendation: Clarification be provided regarding the relocation of the sewer as part of the Kemp Street Bridge replacement works.</p>	<p>RtS: Addressed, work completed as part of preliminary works in this location.</p>	<p>Not required.</p>

Item 23: EIS	Technical Paper 1 – Transport and Traffic	To be addressed:	Council notes reference in the technical paper that closure times at the level crossings would be 121 seconds with or without the proposal. This does not appear to consider train driver changeovers occurring at Junee resulting in the level crossing being closed for extended periods and queuing at the crossing. This will be exacerbated during construction when the Kemp Street bridge is closed, and additional traffic is diverted through the level crossing.	RTS: Not addressed. IR attempted to negotiate a solution to relocate train driver change infrastructure to reduce impacts to existing level crossing. No solution reached to date.	Council supports ongoing discussions with IR, ARTC and other relevant parties to resolve the issues relating to train driver change over delays at the Junee Olympic Highway level crossing.
			Recommendation: In addition to comments provided at Item 1, the scope of works for the A2I should be expanded to include the relocation of the rail infrastructure for the train driver change overs to avoid impacts on the level crossing both during construction and the ongoing operation of the upgraded rail network.	RTS: Satisfied with response.	Not required.
			Reference to John Potts Drive table 5.50 in the technical paper seems to be in error – no relationship to the Olympic Hwy underbridge enhancement site.	RTS: Satisfied with response.	Not required.
			The table also references PCUs and Illabo Road as an urban road. Illabo Road also forms part of the Olympic Hwy – these references are confusing and need to be reviewed.	RTS: Satisfied with response.	Not required.
Item 24: EIS	Appendix H: Outline construction environmental management plan	To be addressed:	The technical paper refers to Wornes Gates Road in Illabo as public level crossing. This is incorrect, this road is not a public road on the southern side of the railway line.	RTS: Satisfied with response.	Not required.
			The proposed road link to the Harefield Yard site needs to be reconsidered, currently shown as an adverse angle access (Fig 4.5.1).	RTS: Partially addressed, proposed option will be investigated.	Not required.
Item 25: EIS	General Comments	To be addressed:	Recommendation: Council recommends separate Infrastructure Interface Agreements be prepared and agreed for all road crossings and interfaces with Council infrastructure prior to the finalisation of designs.	RTS: Addressed.	Not required.
			Recommendation: Council requests as part of these works for the general clean-up of the rail corridor, including disused or redundant rail infrastructure such as overhead wires and poles.	RTS: Not Addressed – considered beyond scope of proposal and an operational matter.	Council supports tidying up of the rail corridor especially in relation to Junee township.
			Recommendation: A commitment to the ongoing maintenance of IR/ARTC assets be provided over the life of the project including mowing/slashing, weed control, fencing etc	RTS: Not Addressed – considered beyond scope of proposal and an operational matter.	Council supports the ongoing maintenance of ARTC infrastructure during and developed as part of the project.
Item 26: PIR	Executive Summary - Changes to the Proposal (page viii)		The executive summary fails to include the introduction of acoustic barriers to the proposal. The PIR does not quantify whether these measures are proposed or a potential option.	Minor observation only.	The PIR executive summary should mention that acoustic barrier are being proposed.
Item 27: PIR	3.2.1.1 Road and pedestrian bridges in Albury, Wagga Wagga, Junee and surrounds (page 3-1)		The assessment method being utilised for the Kemp Street bridge with AS5100 has not been detailed clearly. Council requires assurance that the bridge structure will support all PBS Level 3a combinations to ensure Councils regional infrastructure routes can be maintained and developed into the future. Regional infrastructure routes of key concern include Wagga to Temora via Byrnes Road/Kemp Street, Wagga to Cootamundra via Byrnes Road/Kemp Street and Gundagai to Coolamon, via Gundagai Road/Kemp Street as well as providing access for regular heavy vehicle traffic created by harvest, rail and other local economy items	Major concern for regional traffic	The detailed design for the Kemp Street Bridge approaches should meet AGRD Part 3 and PBS Scheme Network Classification Guidelines
Item 28: PIR	Approach Roads for Kemp St Bridge	Item 10	The approach slopes for the Kemp Street Bridge are still non compliant with AGRD Part 3. Council opposes the departure from AGRD Part 3 and PBS Scheme Network Classification Guidelines. This is of serious concern for Council given the significant safety risks posed by deviation from AGRD Part 3 and PBS Scheme Network Classification Guidelines. Council does not accept the risk posed by this non compliant asset. Further consideration could be made to reducing the levels over Siding 9, given it is not a main line track and the clearance assumably is less critical. This could enable a skewed slope to reduce the grades.	Major concern for intersection safety and ongoing risk management.	The detailed design for the Kemp Street Bridge approaches should meet AGRD Part 3 and PBS Scheme Network Classification Guidelines
		Item 13	Council notes ARTC has suggested TNSW may retain ownership of the asset on completion. JSC would need further details on how this was to proceed to consider this alternative.		
Item 29:	3.2.1.4 Change to level crossing LX605 at the Junee to Illabo clearances enhancement site		Council supports this modification.	NA	Not required.
Item 30:	Figure 3-9 (page 3-13)		Figure inset appears to include outdated left in - left out arrangements.	Omission in Figure 3-9	Figure 3-9 should reflect the written intention of turning from LX605 onto the Olympic Highway in 3.2.1.4

Item 32: PIR	Table 3-4 Proposed Change to Construction Program (page 3-21)		<p>The Kemp Street Bridge construction timeframe has been extended by 8 months to a total of 18 months, with temporary diversions being extended from 8 to 12 months for vehicular traffic. This will have a significant impact (25% increase) on the community particularly to the Olympic Highway Level Crossing and associated detour routes. Council requests that the scope/reason for the extended timeframe be defined, with a detailed mitigation strategy to further reduce the anticipated traffic impacts at the Junee Olympic Highway Level Crossing.</p> <p>Council recognises that the extended construction timeframe, and associated detours, may occur during peak harvest season, which is considered to be unacceptable. Additional damage may occur to Council road infrastructure as a result of significant increases in heavy vehicles movements during this period. Council requests that additional dilapidation monitoring and repairs be conducted if diversions are in place during this period.</p>	Major concern for local and regional traffic.	Council requires that additional information be provided detailing the scope and reason for the additional time allocated for the closure of the Kemp Street Bridge. In addition, a more robust mitigation, management and monitoring strategy should be developed, especially where the construction period will include peak traffic periods throughout the year, such as harvest.
Item 33: PIR	Table 3-5 Changes to Temporary Detour Arrangements as a Result of Bridge Closures (page 3-22)		JSC requires a firm commitment for the delivery of the pedestrian bridge as it has a significant impact on community active transport access.	Major concern for pedestrian access particularly for disabled and vulnerable persons.	IR should confirm its intention to delivering the DDA compliant pedestrian bridge prior to the removal of the Kemp Street Bridge and the intent for the new pedestrian bridge to remain open and be publicly accessible while the project is under construction.
Item 34: PIR	5.1.2.1 Pedestrian Bridges (page 5-2)	Item 10	Noted changes, thank IR for adopting changes.	NA	Not required.
Item 35: PIR	5.1.2.2 Change to level crossing LX605	Item 13	This section needs clarification of the preferred option adopted.	Minor, the preferred option should be detailed.	IR should identify in this section what the preferred option is (left and right in and out).
Item 36: PIR	6.1.1 Approach Overview		Council requests that detailed vehicle travel time surveys be conducted in Junee. Recent traffic modelling provided relies primarily on queue length data from a survey undertaken on 8th June 2023 and level crossing activations within the month of June 2023. This is a very small data window, in the lowest traffic season (off peak) and is not at all reflective of the current base load at the site and regular queue lengths throughout the year. It does not consider the impact of heavy vehicles on the queue length. Further traffic investigation should be undertaken to determine more accurate queue lengths. Although the model indicates the additional delays due to the closure of Kemp Street, the total delay for the community is not clearly indicated in the traffic figures or addressed in the submission. Additionally, it does not consider the safety impacts created through additional heavy vehicles queuing across intersections on Seignor Street and Main Street.	Major concern for intersection safety risks with increased traffic. Major concern for local amenity.	Council requests that a more robust traffic investigation should be undertaken to determine more accurate queue lengths, travel time, level of service and safety impacts during the construction period of the Kemp Street Bridge.
Item 37: PIR	6.1.1.1 Traffic and pedestrian surveys	Item 4	Council requests that detailed vehicle travel time surveys be conducted in Junee. It appears as if the same assumptions and data have been utilised as contained in the EIS, which JSC fundamentally disagree with as limited base data was collected. Travel times can currently be in excess of 10 minutes across this level crossing due to ongoing rail operations.	Major concern for intersection safety risks with increased traffic. Major concern for local amenity.	
Item 38: PIR	6.1.2.2 Traffic Impacts during Kemp St bridge replacement	Item 4	Further detail should be provided around level crossing activations and the length of these closures. The estimated maximum queue length increases also seem not to reflect what Council would expect queue lengths to increase by. Additionally, the level of impact to travel times was similarly not reflective of real world scenarios where this level crossing can be closed in excess of 10 minutes during certain rail operations.	Major concern for intersection safety risks with increased traffic. Major concern for local amenity.	
Item 39: PIR	6.1.2.3 Intersection performance (SIDRA modelling) and road link performance Table 5-1 Engagement Undertaken for Additional Assessments Completed for the Proposal (page 5-1)		Council requests that detailed vehicle travel time surveys be conducted in Junee. While the microsimulation model provides additional insight into traffic movements, the base model data for the level crossing does not reflect realistic traffic loading and queues over the yearly cycle or any peak periods, as detailed earlier. This results in the Level of Service of the intersection being significantly overstated and the actual wait times being significantly understated in the microsimulation model. Council believes if the base data accurately reflected the regular wait times a resulting level of service from A to C, as presented by Inland Rail, with all wait times below 42 minutes, is extremely unlikely for the level crossing and significant improvements are recommended. Additionally, it is unclear how wait times that are unsatisfactory (Level of Service D to F) will be managed, including the northbound crossing from Olympic Highway to Main Street.	Major concern for intersection safety risks with increased traffic. Major concern for local amenity.	
Item 40: PIR	6.1.2.4 Heavy vehicle turn-path analysis	Item 15	The proposal considered upgrades to Pretoria Street and Joffre Street. The upgrades currently proposed are unlikely to be suitable for all heavy vehicle traffic. A regular detour is in place via Old Junee Road and Queen Street for heavy vehicle access. Additionally, Council has other major heavy vehicle routes including traffic from Gundagai Road and Byrnes Road, with current heavy vehicle access that is being significantly limited by the Kemp Street Bridge closure. No suitable upgrades for detours to this route have been proposed for intersections on these routes i.e. Lorne Street, Main Street, Queen Street or Old Junee Road.	Minor, clarification around the detour should be provided.	IR should clarify the proposed detour routes for heavy vehicles, undertake relevant swept path analysis and identify proposed intersection upgrades relating to each detour.

Item 41: PIR	6.1.2.5 Impacts to active transport due to pedestrian bridge closures		<p>The closure periods of pedestrian access should be defined in more detail. These closures should occur outside of school hours. JSC considers that the pedestrian linkage bridge be constructed prior to the removal of the Kemp Street bridge and remain open thereafter. There is total of 1400m detour for school children living in the south west quadrant of Junee who walk to Junee Primary School on a daily basis. This is not considered to be a minor impact to pedestrian traffic should the new pedestrian bridge need to be closed to accommodate activities associated with the construction of the new Kemp Street road vehicle traffic bridge.</p>	<p>Major concern for pedestrian access particularly for disabled, school children and vulnerable persons.</p>	<p>IR should confirm its intention to delivering the DDA compliant pedestrian bridge prior to the removal of the Kemp Street Bridge and the intent for the new pedestrian bridge to remain open and be publicly accessible while the project is under construction.</p>
Item 42: PIR	6.2.4.2 Noise barriers		<p>JSC seeks clarification as to whether the modelled noise barriers are proposed as part of this project or not. Noise barriers are considered to be unacceptable in this location due to the anticipated visual, social and amenity impacts for a historic and rural based community. It is not considered to be acceptable to pass on the requirement for noise barriers to the detailed design stage. JSC maintains that the modelled 5m high barrier would reduce the overall amenity and historic character of the town and that a suitable alternative mitigation measure be proposed.</p> <p>JSC supports at property treatment for all sensitive receivers impacted above the PSNL identified in the PIR.</p>	<p>Major concern due to visual, social and amenity impacts.</p>	<p>Junee Shire Council does not support the use of an acoustic barrier at this location within the rail corridor.</p> <p>Councillors met on the 28 November 2023 and rejected the proposition that a noise wall be erected in Junee.</p> <p>JSC supports at property treatment for all sensitive receivers impacted above the PSNL identified in the PIR</p> <p>If IR intention is to propose an acoustic barrier within the rail corridor in Junee, an additional assessment should be provided detailing the visual, social, and amenity impacts to a rural setting such as Junee. This should include the extent to which graffiti will be managed and removed long term.</p>
Item 43: PIR	6.2.4.3 At-property treatments		<p>JSC requests that the sensitive receptors that still exceed the PSNL when the modelled noise barrier is in place be identified for specific at property treatment.</p>	<p>Minor, at property treatment will need to be detailed further.</p>	<p>IR should specifically identify the receptors that will require at property mitigation measures if the acoustic barrier is installed.</p>