

ARTC Albury to Illabo Inland Rail Objections 2023 Submission to DPE Major Projects

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We live in the Red Zone within 200 metres of major works proposed for the Inland Rail project in Wagga Wagga. We would like to express our objections to the project because of the plan to have double stacked trains travel through the city of Wagga Wagga – a community of almost 70,000 people. We do not object to the overall project to remove trucks from our roads, but we will not support the project unless the route involves a bypass of Wagga Wagga. There should be a new track built to the city's west, over the Murrumbidgee River and across the floodplain to stop at the Bomen rail hub. Wagga Wagga City Council and the state and federal governments have invested millions of dollars in the Riverina Intermodal Freight and Logistics (RIFL) hub and the proposed double stacked freight trains should stop there, but not disrupt quality of life and the health and safety of residents of the city. The project requirement to use existing tracks and the fact the trains are going to be diesel powered rather than electric appears to be short sighted, not visionary as such a multi-billion-dollar project should demand.

The Member for Wagga Wagga Dr Joe McGirr recently raised a litany of serious issues with the proposal in NSW Parliament. He said:

“Discussions on the Melbourne to Brisbane Inland Rail have been happening since at least 2009. The Commonwealth Government started making funding commitments in 2011 and made a major commitment in 2017. However, the current Federal Government undertook a major review of the project by Kerry Schott. The report was published in April this year. It detailed significant issues in the project governance and funding estimates and, importantly, highlighted the need to reserve an easement for a future bypass of inland cities, including Wagga Wagga. Before that, as far as I can determine, there had been little discussion of a bypass for Wagga Wagga. Over the past year, the community has become increasingly concerned about the impact of the project on the city. That was the reason I insisted that the previous Government carefully review the environmental impact statement. It is why I sought an extension to the exhibition period and met with the relevant departments to raise those concerns directly.

As a result of that lobbying and community pressure, the Government required a preferred infrastructure report to be prepared. From that we have learnt some **alarming** new information about the way project currently stands. In the construction phase there is going to be traffic congestion and a possible high strain on key CBD intersections; and two of the four rail crossings in central Wagga Wagga will be out of action, with significant impact on access to the base hospital and the average morning peak travel time changing from six minutes to 15 minutes. After construction, delays at level crossing will increase by up to 18 per cent, noise levels will have minor to moderate increases and, importantly, the number of homes potentially in need of mitigation, called "affected receivers", will blow out from 19, which was the figure in the environmental impact statement, to the 1,285 figure in the preferred infrastructure report.

Just as alarmingly, modelling shows a major impact on Wagga Wagga's air quality. One of the joys of living in regional communities is breathing clean, untainted air. But we now learn that nitrogen dioxide emissions will increase to more than double the relevant criteria, largely because of locomotives idling at passing loops. That is a complicated way of saying pollution from burning diesel will increase to unsatisfactory levels, coupled with increased noise and ongoing traffic congestion. That is a far cry from the relatively rosy picture painted in the original environmental impact statement and presents information that might have remained unknown if we had not successfully pushed for strong and effective review. The question now is, what must be done to prevent those serious problems if the project is going to be approved? Mitigation of noise, vibration and air impacts is promised and essential. But these measures must be effective and must not be harmful to the city's amenity.

Inland Rail assert that these issues will be mitigated. They must be mitigated. We need guarantees that the mitigation of noise, pollution, congestion and vibration will be not only completely effective but completely acceptable to the community. If these guarantees cannot be delivered, then we need to plan now for a bypass of Wagga Wagga and deliver that bypass during construction, not many years into the future. If we do get the guarantees, we still need to be planning for a bypass of the city if train numbers increase.

If the project is to proceed, it must only do so if it is to the benefit of communities along the route and not to their detriment. If that means a bypass, then so be it. Our community deserves no less than a clean, safe and efficient city now and into the future. That is not negotiable." Legislative Assembly Hansard November 29, 2023.

Dr McGirr has summarised the issues well. Our objections to the proposal are numerous, thus the length of this submission.

Air pollution: The trains will be diesel, not electric and nitrogen dioxide emissions will increase to more than double the relevant criteria, risking human health. The Bjelke Peterson government managed to construct extensive electrified freight rail corridors in the 1980s in Queensland, yet despite the real and growing threat of climate change, in 2023 federal and state governments are proposing diesel trains to lumber through towns and cities along the corridor for decades to come at the same time as state and federal governments are promising to reduce emissions in the switch to clean energy. These trains will add to air pollution, despite the Inland Rail project's purported benefit of reducing diesel emissions by removing trucks from the roads.

Noise Pollution: At least 20 and potentially 40 freight trains are expected to travel through Wagga Wagga and other towns on the route, with a consequent increase in noise impacts which will spread further into communities than the existing freight trains which pass through the city. The increase to 40 trains a day is denied by the project team, but few people believe that this will not occur post 2040. Construction on the project will be noisy and sometimes occur well into the night, including some overnight works and will be spread over two years or potentially longer, with significant impacts on nearby residents.

Traffic Congestion: Major traffic congestion will occur across Wagga during construction from bridge closures, even if they are staggered. Post construction the projected 20 trains a day by 2040 and potentially up to 40 trains/day will cause major traffic delays at level crossings in the city, with

negative economic, safety and social impacts. The project has no plan to replace two level crossings in Wagga Wagga with overpasses for pedestrians and cars, leaving this to future government decisions, which is very short-sighted.

Safety Risks: The Sturt Highway intersection with Edmondson Street will be realigned and it will be a very steep climb for cars when the bridge is lifted by almost three metres. Traffic will also build up to the Sturt Highway from the Docker Street level crossing, creating dangers to vehicle and pedestrian movements in the busiest area of Wagga – the medical precinct - and causing traffic delays on a national highway that continues to go through the city, with no plans or date for a heavy vehicle bypass. Kerry Schott's 2023 review of Inland Rail support this: "This chosen route raises concerns in country towns that it bisects and once rail traffic increases are substantial, or likely to be so, consideration should be given to bypass these towns." The Schott review says this should happen after there is an increase in train traffic, possibly 10-15 years, but this is unacceptable for the thousands of residents of Wagga who will be so negatively affected by the current proposal from construction through to operation. There is no evidence the NSW Government has taken any action to preserve easements for a bypass. The likelihood of a western bypass in the distant future appears slim given the new development occurring in the city's west, on what was crown land that could have been such an easement, but is now being sold for new housing.

The Transport for NSW/Wagga City Council Place Study talks about improving connectivity and liveability in the city, and the current Inland Rail route directly threatens this vision. The Schott review says "Modifications to lessen any increased disruption caused by more train traffic should be given very serious consideration and adopted. These changes may include treatment for noise, additional bridge crossings in the town and grade separation." (p 44) There is no plan for additional bridge crossings in the town and in any case, these additional costs could be avoided by bypassing the city altogether.

Inland Rail's proposal does nothing to address the huge number of heavy vehicle east/west traffic through Wagga Wagga on the road from Sydney to Adelaide. We will continue to suffer air pollution impacts from numerous trucks and cars travelling through the centre of the city, along with increased air pollution from the increase in diesel trains projected to go through the city.

Loss of Amenity: The project involves the destruction of heritage pedestrian bridges in Wagga Wagga and numerous other towns on the route. The ARTC admits that in Wagga Wagga "the proposed changes would result in changes to landscape and visual impact due to new and revised pedestrian bridge designs." (p 94) It goes on to say further assessment is required, but that offers no solution. Views will be destroyed by lifting the Edmonson Street road bridge and by removing two beautiful pedestrian bridges. In Edmonson Street, lifting the road bridge by 2.8 metres means a huge increase on the current height of the bridge, similarly with the proposed pedestrian bridges. The proposed new structures will be a blot on the city landscape.

Poor consultation. The ARTC Preferred Infrastructure Report says: "ARTC's values commit the organisation to active engagement with stakeholders and the community. For the Inland Rail program, effective communication and stakeholder engagement are fundamental to minimising the potential for social and environmental impacts as far as possible. ARTC believes that identifying,

engaging and effectively communicating with stakeholders is critical to the successful delivery of Inland Rail.” (p 46).

The ARTC recently cancelled a public information session at Wagga Library 17 hours before it was due to begin, citing fears about a protest. I (Moyra Shields) was among the people who turned up only to be disappointed. The ARTC failed to alert us to that meeting or a subsequent meeting at Kyeamba Smith Hall, despite us living in the Red Zone for construction. We were unable to attend the second meeting due to being out of town. Some people received flyers in the mail about the meeting, but we did not, despite earlier receiving correspondence from ARTC as we live in the red zone.

People without computer skills and high-level analytical skills are unable to be fully informed about what is planned and everyone has difficulty trying to navigate the thousands of pages of complicated information in both the EIS and the Preferred Infrastructure Report and its numerous appendices. I still have not managed to finish reading the EIS and the Preferred Infrastructure Report and appendices often refer back to the EIS.

There is general support in Wagga Wagga for Inland Rail but huge community concern about the impact of trains running through the city. Kerry Schott’s review noted this although she only received six submissions: “The other section in NSW that gave rise to significant community comment to the Review was the Albury to Illabo brownfield section which passes through Wagga Wagga. There were six specific community submissions: several residents were displeased with the route bisecting the town, the potential for noise walls to effectively ‘split’ the town in half, and suggested a bypass around Wagga Wagga. “(p 46)

Traffic and Transport impacts are still vague and as yet unvalidated. The ARTC Preferred Infrastructure Report confirms this: “Feedback received from Transport for NSW on the overall methodology of the microsimulation model for Wagga Wagga highlighted the importance of validating and calibrating the model with Origin–Destination (OD) survey of existing travel patterns in the area. ARTC is planning to carry out OD survey and would use the data to validate the assumptions in the model, and refine the model if required. The outcomes would be confirmed in the future submissions report prepared following exhibition of this Preferred Infrastructure Report.” (p 46) This really means the ARTC does not and possibly cannot predict the impact on traffic. For now, we residents must be patient and blindly hope for answers in a future report.

The impact on Emergency Services is extremely concerning. The ARTC says its briefing with agencies included “topics on construction issues such as traffic impacts during the closure of Edmondson and Kemp Street bridges and operational issues such as further clarification of train numbers, and impacts to emergency service operation due to increased and more frequent level crossing closures. NSW Rural Fire Service queried potential traffic impacts at the Bourke Street/Docker Street level crossing when the Edmondson Street bridge is closed. NSW Ambulance expressed interest in further engagement with ARTC regarding the impacts to traffic during the closure of the Edmondson Street bridge and potential impacts to ambulance operations.” (p 46) This seems to mean the ARTC does not know the impact and it downplays the serious concerns about the undoubted delays in responding to emergencies which will occur during both the construction and operation of Inland Rail.

Even with the suggested mitigation, there will be significant delays at two major intersections on the Sturt Highway, at Docker Street and Lake Albert Road. Those delays will have serious implications for motorists and emergency services. The way the ARTC describes this is confusing as well.

“Signal optimisation—Sturt Highway/Docker Street - In the morning peak, delay is reduced from 256 seconds to 179 seconds; however, LoS is maintained at F. In comparison, the base case is 62 seconds and LoS at E. In the afternoon, delay is not improved, and is slightly worsened from 157 seconds to 180 seconds, and LoS maintained at F. In comparison, the base case is 104 seconds and LoS at F.

Signal optimisation—Sturt Highway/Lake Albert Road - In the morning peak, delay is not improved, and is slightly worsened from 92 seconds to 119 seconds, and LoS maintained at F. In comparison, the base case is 87 seconds and LoS at F. In the afternoon, delay is not improved, and is slightly worsened from 78 seconds to 138 seconds, and LoS maintained at F. In comparison, the base case is 77 seconds and LoS at F.” (p 56)

Transport for NSW required of ARTC that “works do not decrease safety and functionality of the road network” (p 48), but the proposed construction and operation of Inland rail will obviously lead to a permanent decrease in safety and functionality of the road network in Wagga. The ARTC Preferred Infrastructure Report confirms the traffic impacts on p 54: “Environmental capacity thresholds are predicted to be exceeded during construction at 13 roads during the morning peak and at 12 roads during the afternoon peak.” This will have flow on effects to other roads in the city as people try to avoid traffic delays by taking other routes. Further, on p 55, ARTC describes how it aims to mitigate this through changes to traffic signals frequency, but its confusing terminology suggests this may be ineffective. “Intersections where delay is predicted to worsen greater than 20 per cent with the proposal are generally predicted to worsen greater than 20 per cent with the identified mitigation.” That seems to mean no change for 20 intersections so one must ask what benefit is identified by the proposed mitigation.

These will not be short term impacts on residents of Wagga with the Edmonson Street Bridge closure now set to take 14 months at least. We know most major projects take longer than the predicted construction time. Wagga Wagga is split in half by the railway line, with only three north-south routes not affected by the rail line. The ARTC acknowledges there will be cumulative serious impacts but that as yet it doesn't know how bad it might be. We must blindly trust they will find potential solutions in future planning. “It is noted that intersection performance is also driven by the broader network, and mitigation has down-stream impacts in the network, which may worsen results at adjacent intersections. In addition to the specific mitigations modelled in the assessment, other potential mitigations will be further considered during detailed design and construction planning for the proposal. These potential mitigations include but are not limited to: Local Area Traffic Management Plans (LATM), turn restrictions at selected locations, removal of on-street parking/creating clearways at particular times, improved lane delineations.” (p 55)

The other concern is the longer and more frequent closures of level crossings. The ARTC acknowledges it knows little about projected wait times, and that it got it wrong in its EIS. “Submissions received on the EIS raised concerns regarding the accuracy of train speeds used in the traffic assessment, including the application of a typical train speed of 80 km/h to determine level crossing closure times.” (p 66) Now it says an assumed train speed is no longer being adopted as a

key input into the operational assessment. Instead, it uses June 2023 data on level crossing closures to extrapolate wait times. It is unclear whether June is representative of train movements in the other 11 months of the year.

“The longer and more frequent level crossing closures at Docker Street and Fernleigh Road would result in extended waiting times at these level crossings and associated traffic impacts at nearby intersections. The predicted impacts are greater in 2040 than 2025 due to the increased growth in background traffic volumes and the additional train services proposed. To allow for an increased proportion of trains of 1,800 m in length during operation of the proposal, a factor was also applied to conservatively allow for an increase in the average closure time at a level crossing. When compared to their respective base models, average travel times at the Docker Street level crossing will increase at a maximum of 11.5 per cent in the 2025 operational model (in the northbound direction during the morning peak) and 17.8 per cent in the 2040 operation model (in the northbound direction during the afternoon peak). The Fernleigh Road level crossing shows moderate impacts with the highest increase in travel times in the northbound direction in 2040 by 7 per cent. The predicted delay to travel times across these level crossings as a result of operation of the proposal is presented in Table 6-14. The LoS criteria has not been applied to level crossings as it does not provide an accurate reflection of performance due to the infrequency of closures compared to signalised intersections.” (p 67)

The above (though complicated and hard to understand) indicates much longer and more frequent level crossing closures will have to be endured by residents of the city and will have cumulative impacts on numerous other roads in the vicinity:

“The impacts of the longer and more frequent level crossing closures in 2025 and 2040 are limited to some worsening performance of intersections on Docker Street close to the level crossing. These include intersections north of the level crossing: Docker Street/Chaston Street and Docker Street/Brookong Avenue, and south of the level crossing: Bourke Street/Coleman Street, Bourke Street/Athol Street, and Bourke Street/Wooden Street). Table 6-15 and Table 6-16 present the intersections where the delay is predicted to increase by more than 20 per cent in the morning and afternoon peak traffic periods, respectively. The environmental thresholds for residential roads in Wagga Wagga were generally achieved during the peak traffic periods; however, the performance standard is predicted to change as a result of the proposal at eight roads in 2025 and 12 roads in 2040. This includes three roads in 2025 where the maximum environmental capacity is predicted to be exceeded in the morning. In 2040, the maximum environmental capacity is predicted to be exceeded by two local roads (Marshall Street and Emblen Street) and two collector roads (Yentoo Drive and Northcott Parade) during the morning and/or afternoon peak with the proposal. The full list of roads is provided in Appendix C.” (p68)

ARTC admits the impacts will be significant and negative in consequence. This will affect thousands of people: “The potential impacts considered include: severance due to the longer and more frequent level crossing closures, local community impacts such as disruption to access to educational, health and emergency services, local workforce and socio-economic impacts such as disruption to access to employment.” (p 70)

The ARTC rates the impact as medium for community severance, low on accessibility for residents and medium on accessibility for emergency services: “Educational services – Low, Health services –

Low, Emergency services – Medium.” (p 72). The impacts are in fact major for community severance accessibility and emergency services. The ARTC’s comment on community severance is a massive understatement in saying only a few residents living close to the level crossings *may* suffer noticeable inconvenience as people right across the city will be affected: “It is possible that increased frequency of the level crossing closures and increased travel time across the level crossings might lead to noticeable inconvenience for the residents living in the southern part close to Docker Street and Fernleigh Road level crossings, resulting in moderate magnitude of the impact. As such, the community severance impact is expected to be Medium.” (p 71) There is a promise to try to alleviate the impact for emergency services, but again, it is vague and the solutions are yet to be identified. “Mitigation measure TT3 (now TT4) has been updated to include consultation with emergency services and the Local Emergency Management to provide further information on train movements and level crossing closures to assist emergency services in their emergency response and travel planning in the operational stage.” With longer and more frequent level crossing closures, response times will inevitably be increased.

ARTC further states that community engagement is the answer. “The mitigation measures detailed in chapter 27 of the EIS address social impacts of level crossings through the following mitigation measure SI12: Development of an operations communication and engagement plan that builds community awareness of the rail line’s operational characteristics, including information on level crossing operations, likely daily train movements and ARTC’s ongoing role after construction. Special attention should be given to informing educational, medical and emergency facilities (mitigation measure SI12). Continued engagement with the community about potential ways for people to be informed about the time of day in which trains may be passing through a level crossing, to facilitate access and movement around the town. The proposed measures will support the mitigation of the social impacts caused by the longer and more frequent level crossings closures. No further mitigations are proposed.” (p 72) This means the community just has learn to put up with Inland Rail’s impact on life in the city for decades to come, requiring residents and emergency services to plan their trips based on freight train movements, placing the value of economic outcomes for rail ahead of amenity and safety for a growing city. The Wagga Wagga City Council population forecast for 2023 is 69,241, and is forecast to grow to 77,540 by 2036 - <https://forecast.id.com.au/wagga-wagga#:~:text=The%20Wagga%20Wagga%20City%20Council%20population%20forecast%20for%202023%20is,grow%20to%2077%2C540%20by%202036>

Should NSW Planning approve Inland Rail going through the city, it is imperative that the road-rail level crossings be removed and replaced with overpasses for vehicles and pedestrian bridges. ARTC maintains there is no need to replace level crossings with overpasses at Docker Street and Fernleigh Road, regardless of the major impact that more frequent and longer trains would have on traffic and pedestrian movement. It says: “Further assessment of level crossings subject to high traffic volumes were conducted, including the level crossings on Docker Street, Fernleigh Road in Wagga Wagga and on Olympic Highway (Balfour Street) in Culcairn. It is noted that these level crossings are not part of the proposal scope. In summary, over the period from July 2014 to March 2022, there were no vehicle or pedestrian collisions reported at these level crossings (no fatalities or injuries). A total of 13 of the 17 near misses were with pedestrians, with the majority of these being reported at the Fernleigh Road level crossing.” (p 72) The Fernleigh Road level crossing is in Ashmont, one of the poorest suburbs in Wagga, where walking may be people’s only choice to get around. As it’s a low

socio-economic area, it is not surprising it has a higher number of pedestrians who will face increased severance and danger from more frequent and longer trains. ARTC says it plans to produce a 'treatment' report on level crossings, but in a confusingly worded statement, there is no promise of improvement: "ARTC has included the new mitigation measure TT26, which outlines that a public level crossing treatment report will be prepared to document the assessment and design process that has been undertaken for level crossings within the proposal scope. The report will be developed in consultation with Transport for NSW and the relevant councils. The report will provide an assessment of road risks consistent with the guideline Establishing a Railway Crossing Safety Management Plan (RTA, 2011). Justification will be provided where no works are proposed to existing public level crossings within the proposal scope." (p 73)

ARTC is vague also about what other traffic mitigation measures may be found, if any. It states: "Early consultation will be undertaken with road authorities (local councils and Transport for NSW (Transport for NSW)) and public transport service providers for aspects of the proposal that may require changes to the road network. This includes: consideration of additional mitigation measures to improve traffic efficiency during construction, such as temporary changes to signal phasing at intersections along the traffic diversion routes in Wagga Wagga during the Edmondson Road bridge closure, consideration of other projects, in addition to aspects of the proposal that may require changes to the road network." (p 73) This really tells us nothing about how these major traffic impacts will be fixed and I have no confidence they can be fixed or even mitigated.

There is no way for the lay person to understand the information provided by the ARTC on noise and vibration impacts, but the number of people and places affected is huge. The ARTC says "Noise and vibration impacts during construction are anticipated to increase as a result of the proposed changes to the design and construction footprint." (p 94) The terminology on noise and vibration is also confusing. For example: "LAeq, which is the equivalent continuous noise level, providing a representation of the cumulative level of noise exposure over a defined period, LAm_{ax}, which is the maximum noise level during the measurement or assessment period... The assessment criteria are the same as described in chapter 15 of the EIS and EIS Technical Paper 7: Operational Noise and Vibration (Rail); however, the interpretation of the criteria has been varied following advice from the NSW EPA. Refer to Appendix D for further information on the assessment criteria used in this assessment for airborne noise, ground-borne noise and ground-borne vibration." What does this mean? It is clear many thousands of people are going to be affected in the Albury to Illabo section.

Number of receivers with 2 km of the rail corridor (Does 'with' mean 'within'?)

Residential 1 28,343

Schools, educational institutions and child-care centres 380

Place of worship 82

Medical facility 41 (p 76)

"The daytime LAeq criteria is predicted to be exceeded at 138 residential receivers in 2025, and 190 residential receivers in 2040. The night-time LAeq criteria is predicted to be exceeded at 60 residential receivers in 2025 and 92 residences in 2040. While LAm_{ax} noise levels are not predicted

to change as a result of the proposal, existing rail noise levels combined with proposal-related LAeq increases generate exceedances of the Rail Infrastructure Noise Guideline triggers at 1,219 residences in 2025 and 1,285 residences in 2040.” (p 79) That means a lot of mitigation work will be required for these residences. How much will this cost and is there any guarantee that the works will reduce noise on these properties? The report then states: “Number of triggered residential receivers Wagga Wagga – 662.” Again, the information about noise and vibration impacts is very confusing!

On the Albury to Illabo section, there will be potentially very costly mitigation required to numerous schools, churches and other public places.

“TABLE 6-25 NON-RESIDENTIAL RECEIVERS PREDICTED TO TRIGGER PROPOSAL NOISE CRITERIA
(YEAR 2025 AND 2040)

The Scots School Albury, Gerogery Public School, Gerogery Church, Culcairn Public School, Balfour St Church, Culcairn, Greater Southern Area Health Service Henty, (It’s actually the Murrumbidgee Local Health District, Greater Southern Area Health Service was disbanded in July 2011), Henty Uniting Church, Henty Presbyterian Church, Riverlife Church, Henty, Henty Hospital and Health Service, Yerong Creek Public School, Cole St Church, Yerong Creek, Uranquinty Preschool, Uranquinty Public School, St Patrick’s Catholic Church Uranquinty, Seventh Day Adventist Reform Uranquinty, St James Uniting Church, Uranquinty } St Cuthbert’s Anglican Church Quintessential Chapel Uranquinty, Kildare Catholic College, Wagg Wagga, ErinEarth Centre Wagg Wagga , South Wagga Public School, Goodstart Early Learning Wagg Wagga – Station Place, St John’s Anglican Church Wagg Wagga, Calvary Riverina Hospital Wagg Wagga, Goodstart Early Learning Junee, Junee Preschool, Junee Baptist Church, Illabo Public School. (p 81).

The ARTC’s proposed noise mitigation options are again extremely vague, promising answers in the detailed design phase and do not offer any guarantees to the community. In highly technical language referring to the people most negatively impacted as ‘receivers’ it says: “At-source controls are the most efficient and effective mitigation option to reduce operational rail noise on A2I. Three at-source mitigation options are now included in the updated operational rail noise and vibration (rail) assessment (Appendix D): installation of exhaust silencers on legacy locomotives operating on A2I via the Locomotive Noise Control Program (refer to Appendix G of the Updated Rail Assessment), review of mitigation options for open transom and steel rail bridges, use of soft-tone level crossing bells and/or turning level crossing bells off at night (where safety is not compromised). These measures will be further refined as the program progresses and, if identified as feasible and reasonable, will be detailed in the operational noise and vibration review for implementation. Twelve conceptual noise barriers have been identified to address exceedances of the project-specific noise levels at Culcairn, Henty, The Rock, Uranquinty, Wagg Wagga and Junee where receivers are grouped on the same side of the track and the barrier was feasible and effective. A barrier height of 4m was able to mitigate the predicted exceedances of the project-specific noise levels at most locations; however, a height of 5m for barriers ‘Wagga 1’ and ‘Junee 1’ was determined to perform the best at mitigating the predicted exceedances of the project-specific noise levels (refer to Table 6-27). For the predicted 2040 (design year) railway noise levels, the number of exceedances of the assessment criteria with and without a noise barrier, for various barrier heights, are summarised in Table 6-27 for residential and non-residential receivers (referred to as ‘other sensitive’). The updated operational noise and vibration (rail) assessment (see Appendix D) includes the locations and

predicted noise reductions at receivers associated with these barriers. Noise barriers would need to be solid structures constructed from material such as autoclaved aerated concrete or pre-cast concrete. Should noise barriers be deemed required in the operational noise and vibration review, the final location and extent of noise barriers would be determined by ARTC in consultation with the impacted sensitive receivers.” (p 83)

The ARTC’s initial review of air quality impacts in the EIS was seriously lacking, leading the DPE to order more assessment. The ARTC’s new case study approach using modelling, is confusing, highly technical and hard for a non-expert to assess. It also only considers potential air quality impacts within 200m of the rail corridor and the information about high levels of nitrogen dioxide is very concerning. “The 24-hour PM10 and PM2.5 concentrations (for all operational years), are predicted to exceed the assessment criteria for passing trains, idling trains, and the combination of passing and idling trains at Wagga Wagga Urban case study area. These exceedances are mainly driven by elevated background concentrations, which already exceed or approach the assessment criteria. The NO2 concentrations are predicted to exceed the assessment criteria during idling (1-hour) and combined idling and train passing (1-hour and annual) at the Wagga Wagga Urban case study area and the Culcairn Rural case study area.” The report says Wagga Wagga urban has significant train contributions to Nitrogen Dioxide levels and these can only increase with longer and more frequent freight trains travelling through the city. I do not understand why the pollution would not affect people outside the 200m limit. A 2005 report on transport emissions says: “The areas of greatest uncertainty for rail are the exhaust profiles for volatile organic compounds and particulate matter where diesel truck engine profiles are used.” Bureau of Transport and Regional Economics WORKING PAPER 63 HEALTH IMPACTS OF TRANSPORT EMISSIONS IN AUSTRALIA - https://www.bitre.gov.au/publications/2005/wp_063). The ARTC’s answer to this is to put the onus on private rail firms using Inland Rail and it is vague about how changing their operational patterns would reduce air pollution impacts.

“While exceedances are modelled to occur along the rail corridor, the maintenance and operation of trains is the responsibility of the train operators. During operation of the proposal, it is expected that existing trains that have reached their operational life would be retired from use and replaced by new models that would be required to comply with the latest air emission limits, as specified in EPLs required for train operators under the Protection of the Environment Operations Act 1997 (NSW). These EPLs require new trains to comply with stricter noise and air emission limits, while existing trains are covered by legacy operational controls. The operation of inland Rail will necessitate changes to operational patterns on the rail network, which provides an opportunity to further consider sequencing of train movements and utilisation of crossing loops in close proximity to sensitive receivers, to reduce air quality impacts.” (p 91).

Again, residents are expected to trust the ARTC to come up with mitigation measures at some time in the future simply by liaising with private train operators: “Where analysis indicates exceedances related to existing train operations, a review of relevant operating procedures will be undertaken including consultation with the train operating companies to explore options to reduce train operation’s contribution.” This is work that should have been done by now given the ARTC is aware of trains’ current contribution to air pollution, let alone the predicted increase in air pollution under

Inland Rail. There is also a question about why the EPA is not requiring train operators to address the air pollution now.

Kerry Schott's review of Inland Rail found current cost estimates cannot be trusted, and we believe the cost of a bypass of Wagga should be investigated now, before the Albury to Illabo project begins. The review says: "The ARTC estimate of the cost of the project has increased by an astonishing amount when compared to 2020. Two years ago, the estimate was \$16.4 billion and now it is about \$31 billion. In my view this cost estimate should not be accepted by the Shareholder as there is insufficient certainty about the scope, the related schedule, and delivery costs to have any confidence in the numbers." (p 6) The review said: "In summary, notwithstanding that the cost estimate is better developed and more comprehensive than in 2020, it is difficult to have confidence in the updated cost estimate put forward by ARTC. Further detailed investigations would be required to validate the cost estimate." (p 14) Surely as taxpayers we deserve to see evidence of this work being undertaken before the Albury to Illabo project is begun. It is hard to have confidence in the infrastructure report prepared by ARTC when the Schott review has little confidence in the ARTC Board to oversee such a project. Her review found: "the ARTC Board appointments in 2022 did not reflect the skills required to govern either rail freight operations or a major infrastructure project." The Schott review raises serious questions about the cost of this project, which has yet to undergo detailed design or receive planning approval. "Where detailed design of the route has not been finalised or gained environmental approvals, contracts for tender cannot be finalised and tender outcomes including prices cannot be assessed. Construction has not commenced. It is not until a section is designed in detail and approved that a reasonably confident, though preliminary, estimate can be made. It is also not until the work is tendered that greater confidence can be placed in the estimates." (p 47)

The ARTC has since appointed a new board for Inland Rail whose directors have more of the experience required for major projects. But the Inland Rail Board no doubt has to report to the ARTC Board whose directors have limited experience of the type the Schott review referred to. This link - <https://www.artc.com.au/about/directors/> lists six directors. It says ARTC appointed a new chairman, Peter Duncan in February 2023 who has experience in infrastructure projects. That link, updated September 2023 also lists one director as an engineer with experience in rail projects, but other directors are accountants, lawyers, and a former politician who is said to have extensive experience in working with railway communities, managing cultural change and driving reform in regional areas. With no disrespect to these people, the ARTC board still does not appear to represent the skills mix Kerry Schott referred to as critical to the project's success.

The ARTC Inland Rail page - <https://inlandrail.artc.com.au/our-team/> lists 13 directors with more extensive rail and infrastructure experience. The Inland Rail Board Acting CEO and Acting Executive Chair has extensive experience and his bio says he has "a proven record of major project delivery." But one of the project's quoted in his bio is developing and awarding the first two stages of the WestConnex Project in Sydney. WestConnex has come in for widespread public criticism and there has been official criticism of the government's oversight of it from the NSW Auditor General. That project has also been criticised by residents and schools who said that help for people affected by loud construction noise was "wholly inadequate". (The Guardian, Dec 17, 2018) WestConnex was at the time Australia's largest infrastructure project costing \$16.8 billion. Inland Rail, with a cost of

\$31-billion or possibly much more, has great potential to deliver similar problems. I also have concern that the Department of Planning and Environment may approve the Inland Rail project despite the significant community impact and calls for a bypass. As the WestConnex Action Group stated in 2018, DPE “approved Stage three of the WestConnex, the M4-M5 link, for which there is still *no actual engineering design*, only a concept plan.” This should not happen with Inland Rail. Further the Auditor General said of WestConnex “Programs of this scale require greater ongoing transparency on total costs and benefits in order to ensure confidence they will meet intended objectives within budget.” <https://www.audit.nsw.gov.au/our-work/reports/westconnex-changes-since-2014#:~:text=Since%20the%20NSW%20Government%20sold%2051%20per%20cent%20of%20its,th e%20performance%20of%20tolling%20concessions>. This is equally relevant to the Inland Rail project and there is a question about what NSW Government oversight there will be of a federally (taxpayer) funded project.

The ARTC Inland Rail Preferred Infrastructure Report states on p 22:

The Infrastructure assessment has two objectives, one of which is to:

- minimise the potential for environmental and community impacts, by maximising use of the existing rail corridor.

This is clearly not the case for Wagga Wagga, the biggest inland city in NSW which will suffer major heritage, environmental, community, health and safety impacts. The city should be bypassed by Inland Rail. The construction time frame for projects in Wagga Wagga has been increased, meaning there will be longer community impacts in construction – one lasting 24 months. The closure of Edmonson Street to build a new road bridge almost three metres higher to cater for double stacked trains is now expected to take 14 months. We live within 200 metres of that bridge and will be severely impacted by the project. Also, rarely do such infrastructure projects get completed within the time frame given in the planning stage.

In conclusion, we believe the Inland Rail project should be built, but make it electric and bypass Wagga Wagga and potentially other towns along the route. It will cost billions more, but the current project will see billions of taxpayer dollars being spent to permanently negatively affect lives and livelihoods in regional areas along the route. Please halt the current plan for a year or two or more if necessary to get the project right and ensure it is something we will be proud of in 100 years or more.

Moyra Shields [REDACTED]

Luke Grealy [REDACTED]