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Director – Freight Assessments and Management
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Dear Director

**Exhibition of State Significant Infrastructure Application
INLAND RAIL – ILLABO to STOCKINBINGAL
Application number SSI-9406**

Junee Shire Council (JSC) welcomes the opportunity to make a submission in relation to Inland Rail's (IR) Illabo to Stockinbingal (I2S) Environmental Impact Statement (EIS).

Attached is a summary of JSC's key concerns, recommendations and comments relating to the project. While JSC supports the intention of IR for the movement of freight, Council submits the project will have major impacts on local infrastructure and the wider community within the Junee Local Government Area during the construction and ongoing operation of the upgraded network. JSC submits these concerns have not been adequately addressed or assessed in the EIS.

JSC considers based on the information made available, the following *objectives of the IR program and proposal* have not been met:

- *Improve road safety, ease congestion, and reduce environmental impacts by moving freight from road to rail*
- *Minimise the potential for environmental and community impacts by maximising use of the existing rail corridor.*

The project should accommodate improving affected infrastructure if the current infrastructure is not compliant with appropriate standards. To undertake anything less is a critical concern for JSC and our community.

There are numerous issues outlined in the attached summary and we welcome further engagement to rectify these highlighted concerns as the project progresses.

Yours sincerely




Stacy Moses
Director Planning & Community Development

Summary of Feedback

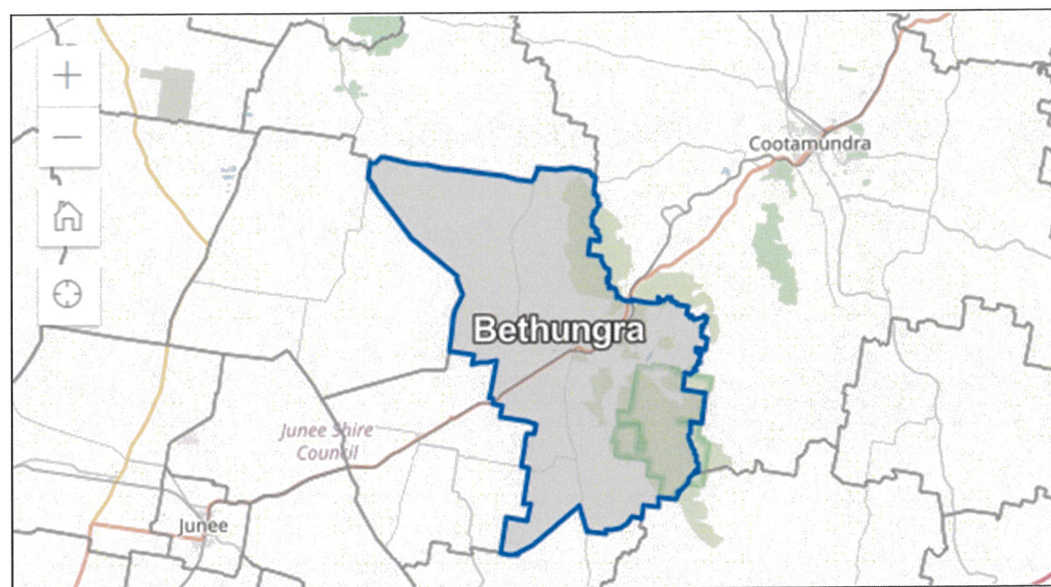
	Junee Shire Council assessment	I2S EIS response	Junee Shire Council comments on EIS
Ch4.3.2 Ch7.3.2	Crossing Loop and Rail Maintenance Access Road	Acknowledged	JSC thank the proponent for changing the location of the rail maintenance access road to the eastern side of the rail corridor to improve firefighting outcomes.
Ch5.5 -	Table 5-1 Strategic Context	To be addressed.	<p>The EIS refers to the Future Transport Strategy 2056, but the proponent has not considered the broader aspects of this strategy – assessment is confined to the benefits of the Inland 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 with other modes, considering the broader aspects of this Strategy.</p>
Ch7.2.7.2	Private Crossings and Cumulative Agricultural Impact	To be addressed.	<p>The EIS identifies the proposal would interface with 75 private roads including six primary access tracks and 58 existing farm tracks. The EIS states that:</p> <p><i>Where occupational (private) crossings are proposed, ARTC would work with landowners to develop a design that takes into account their requirements. For example, in areas where landowners use large farm machinery and run livestock, the design of the level crossing would include stock-proof fencing, secured gates and suitable approach grades.</i></p> <p>JSC holds concerns regarding the cumulative impacts on agriculture efficiency that may negatively affect the agricultural sector given the extent of the I2S project.</p> <p>Recommendation In addition to the proponent negotiating with individual landowners for on-farm private crossings and stock underpasses, the proponent should also undertake analysis on the cumulative economic impacts of the I2S project on the agriculture sector including economic impacts of reduced accessibility of or to agricultural land.</p>

Ch7.2.8.2	Ironbong Road Modifications	To be addressed	<p>ARTC are proposing to realign Ironbong Road to increase sight distances and a reduced design speed of 90 km/h from the default rural road speed of 100 km/h. Advisory signage will also be installed in this location to improve safety and reduce the speed of vehicles approaching this crossing, especially from the north.</p> <p>Recommendation: JSC recommends if the design parameters for a 100km/h rural road cannot be met then the posted speed limit should be reduced through Transport for NSW (TfNSW) to an appropriate speed for that portion of road adjoining the proposed level crossing.</p>
Ch7.3.5	New Fences	Acknowledge	<p>Fencing would provide physical separation of the railway corridor from the adjoining land. The intention with a boundary fence is to protect the rail corridor and to mitigate the risks associated with individuals and livestock accessing the rail corridor.</p> <p>JSC supports the installation of fencing between public roads and the rail corridor.</p>
Ch8.2.8.2	Road Modification Ironbong Road	To be addressed	<p>Figure 8-3 has a staging plan for Burley Griffin way realignment, outlining the proposed staging and works for this realignment. Although significantly less complicated, it would be beneficial to include a similar schematic in the EIS showing the staging of the Ironbong Road realignment, being the only other major road realignment work for this section of the Inland Rail.</p> <p>Recommendation: The EIS be updated to include a staging schematic for the proposed realignment of Ironbong Road.</p>
Ch8.2.13	Finishing works and reinstatement	To be addressed	<p>The EIS, in this section and overall, does not adequately address the interface of the proposed works with existing Council infrastructure or utilities in the proposed works area.</p> <p>Recommendation: The EIS should be amended to include approval for the designs for the road and drainage interfaces by Council before being finalised. This section should also detail an agreed quality assurance process for handover of assets back to Council.</p>

Ch8.5.4	Construction Supply	Water	<p>To be addressed.</p> <p>It is noted in the EIS that connection to the Goldenfields Water reticulated water infrastructure is proposed to facilitate water supply for construction requirements. Council has concerns that the supply of water for this purpose may significantly impact the availability of water for residential purposes in nearby villages and rural areas. Previous dealings with Goldenfields have indicated the existing supply infrastructure is already at capacity with minimal ability to accommodate additional connections.</p> <p>Recommendations: Council seeks additional clarification that the proposed supply of water for construction purposes will not significantly impact existing residential usage.</p>
Ch11.2.4	Risks Identified		<p>Request</p> <p>Council notes the EIS (Chapter 11) does not seem to have considered the changes in the movement of <u>local traffic during harvest time</u> and how the proposed local road diversions may impact on the safe and efficient movement of plant and equipment engaged in the harvest. Although the road diversions have been assessed in the EIS as resulting in delays of up to 17min, the delays for slower moving harvest equipment will be a lot longer which could impact significantly on achieving an efficient harvest.</p> <p>Recommendation: The EIS should include an assessment of the potential impact to harvest traffic of the construction phase of the development. Additionally, traffic counts should take into consideration the worst-case scenario.</p>
Ch11.3.1.2	Local Roads Table 11-1 Local Road		<p>Omission</p> <p>The EIS identifies the local road of Old Cootamundra Road is under the control of Cootamundra-Gundagai Council. It should be noted in this table that a portion of Old Cootamundra Road is located within June Shire Council LGA and under the control of Council. It is acknowledged that the proposed work site is clearly within the Cootamundra-Gundagai LGA, it is considered that there may be impacts to this local road as a result of construction traffic or haulage.</p> <p>Recommendation: This section and table should be updated to include June Shire Council as a road authority for Old Cootamundra Road.</p>

Ch11.3.2	Traffic Count	Heinz	<p>The traffic counts for Ironbong Road and Old Sydney Road in the EIS are not considered to accurately represent the amount of traffic that utilises these routes, especially during peak harvest season.</p> <p>Recommendation: The EIS should undertake more traffic assessment, including a more rigorous approach to assessing traffic impacts rather than making assumptions via a desktop analysis.</p>
Ch11.3.3	Table 11-3 Population Town	Typo	<p>The table refers to ABS Bethungra population declining by 16.9% from 414 in 2011 to 164 in 2016. The figure in 2016 of 164 is right and the 2021 was 137.</p> <p>SAL areas changes between 2011 and 2016 for Bethungra, as shown below, contributing to poor statistical analysis in this section.</p> <p>2011</p> 

2016 and 2021



Council disputes the EIS 11.3.3 Traffic growth rate referring to 0.5 % based on population growth. This is not correct with regional traffic studies forecasting a growth rate for traffic in the order of 3% aligned with the growth of industry, agriculture, and primary production across the region.

Recommendation:

The assumptions used to inform the EIS should be updated to include more accurate traffic growth statistics. The EIS should also acknowledge the change in SAL that contributes to the apparent significant decline in overall population of Bethungra.

Ch 11.3.6	Public and Active transport	To be addressed	<p>The EIS acknowledges that daily passenger and school bus services operate between Junee and Wagga Wagga traveling on Olympic Highway, however the EIS does not include or identify the many local school bus pickups from farm gates and the potential impacts to these routes as a result of the proposal. In addition, it is noted there are school buses that service these areas into Cootamundra and Junee, as well as other local schools including Illabo Public School.</p> <p>Recommendation: The EIS should identify and adequately assess the impacts to local school bus routes as a result of the proposal.</p>
Ch 11.6.4	Recommended Mitigation measures	Note	<p>The mitigation measures identified in the table (T-1 to T-4) are anticipated to be prepared at Detailed Design stage. These mitigation measures should be prepared and implemented with the consultation of Council.</p> <p>Recommendation: Any recommended mitigation measures should be prepared in consultation with the relevant Councils.</p>
Ch8.9.2, Ch 11	Haulage Routes Impact to Local Roads	To be addressed.	<p>Council notes the assessment on impacts to the condition of rural roads due to construction traffic as described in the EIS has determined the residual risk of damage to local roads is low (table 11 – 11).</p> <p>Council disputes this assessment and the adequacy of the proposed controls in particular undertaking a dilapidation survey at the commencement of works. These roads will require assessment and preventative upgrades to support the traffic as early works - prior to I2S construction works commencing.</p> <p>Recommendation: To ensure the impacted rural local roads will be able support the proposed construction traffic, the capacity and integrity (strength and geometry) of the subject roads should be assessed as part of the project planning phase and any required upgrades undertaken as early works prior to the commencement of construction. It is not appropriate for a reactive approach to be applied to the management of local roads with repairs being undertaken when the road fails and becomes hazardous.</p> <p>A proactive and preventative approach must be implied to the management of the local roads impacted by the works, including upgrade works where necessary.</p>

Ch 12	Overland Flow – Hydrology and Flood Modelling	To be addressed.	<p>Council notes the EIS does not seem to have considered the overland flow of stormwater outside of creeks and water courses. Council notes the new rail infrastructure will have a significant impact on the movement of surface water across paddocks and along roadways which if not managed appropriately could result in localised flooding by diverting water from its traditional flow paths. This cannot be adequately modelled in a desktop environment and should be assessed in the field and take into account local ground conditions and land uses.</p> <p>Recommendation: The EIS should undertake more robust investigations to determine the level of impact resulting from the disturbance to overland flow paths.</p>
Ch 18.3.6.1	<p>Weed control See 18.4.2.3. See mitigation in 18.6.</p> <p>Table 18-3 LP-10 Biosecurity</p>	To be addressed.	<p>The EIS does not propose mitigation measures to limit the spread of weeds by construction trucks travelling the length of the corridor, relying on the CEMP to propose the management of weeds during construction. Identification of predominant weed species should also be conducted along the length of the project.</p> <p>In addition to the LLS and DPI, Council also plays a regulatory role in the management of weeds and biosecurity in each LGA. The EIS does not acknowledge this role or make provision for the consultation with Council regarding biosecurity issues.</p> <p>Recommendation: The development of the CEMP should include consultation with Council in relation to biosecurity. The measures proposed to manage the spread of weeds should include vehicle washdowns at each property boundary and prior to the entry or exit from the road corridor.</p>

Ch 21.3.1.5	Disposal of Waste	To be addressed.	<p>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.</p> <p>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.</p>
Summary and Ch 17.1	Community Investment Program	To be addressed.	<p>The EIS states twice that a community investment program has been/will be organised to support local communities, including sponsorship of regional shows and community organisations, but limited further detail is available relating to the total monetary amount or how long this program will continue.</p> <p>Recommendation: The proponent should provide additional clarification as to the longevity of these programs and the approximate overall net benefit to the community.</p>
Ch11.5.1.2	Civil Design, Rail Crossing.	To be addressed.	<p>Junee Shire Council is concerned with the proposed passive crossing across Old Sydney Road (Chainage 5500). This creates a high safety risk for road users, as it is on an open straight backroad and road users will not be anticipating stopping. AGRD Part 2 Section 1.4.1 Safety Objectives states:</p> <ul style="list-style-type: none"> - <i>a safe road should warn road users of any substandard or unusual features',</i> - <i>control road users' passage through conflict points or conflict sections, and</i> - <i>be forgiving of errant or inappropriate behaviour</i> <p>Junee Shire Council (JSC) believes the current design fails to adequately warn road users of an unusual feature and fails to control their passage through this conflict and because of this, fails to mitigate the risk. In addition, the 5% grade on approach creates sight distance concerns and JSC believes road users will not be aware of other vehicles or the upcoming passive crossing. JSC recommends the installation of an active crossing in this location. An active crossing would 'Control road-users passage through conflict points or conflict sections' rather than leaving it to the driver's discretion. Inland Rail should not rely on a driver to</p>

			<p>negotiate this type of crossing, with a high risk of errant behaviour. Warning signs included in the design will be ineffective in reduced visibility conditions (dust from following another vehicle, sun glare, poor lighting, smoke hazards or shadow from trees). This could result in a train-motor vehicle collision or a rear end motor vehicle collision.</p> <p>Recommendation: Council advocates for the installation of a Type F active crossing and bitumen seal for 150m either side of the crossing in this location to preserve the safety of road users on Old Sydney Road.</p>
Technical Report 3	Traffic, Transport and Access	To be addressed.	<p>Council notes the local road diversions and associated time delays described in the EIS (Technical Report 3 - Traffic, Transport and Access Impact Assessment) seem to have only been assessed in a desktop environment. For example, the Eulomo Settlement Road diversion includes several low-level water crossings that may not be passable during wet weather and will not likely withstand construction traffic.</p> <p>Recommendation: The EIS needs to include more thorough, onsite assessments for planned local road diversions and their suitability.</p>
General		To be addressed.	<p>Throughout the EIS, Construction Traffic Transport and Access Management Plans are 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.</p> <p>Recommendation: That any Notice of Determination provides a requirement for Councils to be consulted during the preparation of Construction Traffic Transport and Access Management Plans.</p>
General		To be addressed.	<p>Council notes the EIS refers to some tree clearing to accommodate works and improve sight distances.</p> <p>Recommendation: Prior to undertaking clearing/trimming within road corridors and public spaces outside of the rail corridor, Council is to be advised of these works.</p>

Ch25.4.2.1		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 in consultation with the RFS.</p>
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