

Submission on the Illabo to Stockinbingal Project

Administrative Modification 01 — CSSI 9406

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1. Introduction

We acknowledge that the Illabo to Stockinbingal section forms part of the Inland Rail route, now described as the Melbourne to Parkes corridor. It is one of several sections that together make up the proposed new rail link.

However, the proponents have not clearly addressed a key distinction: this is the only section of the route classified as greenfield. The Illabo to Stockinbingal section is therefore a completely new build, not a modification of existing rail infrastructure.

By contrast, the enhanced brownfield sections involve upgrades to existing infrastructure. Those sections do not require new level crossings; instead, they involve crossing enhancements and new or modified road-over-rail bridges.

2. Modification Overview

Proposed change. The proposed modification would change the conditions of approval for level crossing design by replacing the current requirement for endorsement by the relevant road authority with a requirement for consultation only.

Stated intent. The modification is presented as a reallocation of approval responsibility. Responsibility for road design approval would sit with the responsible rail infrastructure manager, rather than being removed altogether.

Community concern

We are concerned that this reallocation of approval responsibility will remove local knowledge from the decision-making process. Junee Shire Council would no longer have an approval role in the final level crossing plans and would instead only be consulted.

The modification is described as administrative in nature and will have no increase in environmental impacts. However, changing the roads authority's role from endorsement to consultation is a significant change for the local community and the roads environment because it affects how local road safety, access, and operational knowledge will be considered.

Local road network impacts

The local community accepts, with reluctance, that this new project is proceeding. Our concern is that, unless the impacts are properly managed with strong involvement from our Local Shire Council and the local community, the project may place unnecessary pressure on the local road network.

Appendix A of the modification report provides a detailed description of the proposed change, with further justification provided in Section 3.2.

Proponent's justification. In Section 3.2, the proponent appears to rely on the

argument that giving the road authority approval or endorsement rights over level crossing design is inconsistent with both governing legislation and State policy.

Relevant guidance. Both the *Planning Road Infrastructure Upgrades at Railway Crossings* guideline and the *National Level Crossing Safety Strategy 2023–2032* emphasizes the need for cooperation between road managers and rail authorities when decisions are made about railway crossing treatments. Cooperation requires parties to work together in a shared decision-making process. It is not the same as consultation alone.

3. Methodology for Determining Level Crossing Treatments

As a community, we acknowledge that level crossing safety is a very important issue for communities across NSW. For that reason, we are concerned about the Public Level Crossing Treatment Methodology being applied to this section of the project.

We accept that a consistent assessment model is appropriate when reviewing existing rail-road crossings. However, the methodology relied on here was designed for existing level crossings and not new builds.

The Illabo to Stockinbingal section is a new build. For that reason, we do not consider the treatment methodology to be directly applicable in the same way it may be for existing crossings. The Department of Planning, Housing and Infrastructure plays a critical role in ensuring that major infrastructure projects align with Safe System principles. Those principles require the transport network to be designed to minimise both the likelihood of crashes and the severity of their consequences.

The referenced ALCAM assessment is tailored by the rail authority and appears to prioritise rail-related risks. In our view, it does not give sufficient weight to road safety risks. For example, it may not adequately account for straight roads, where higher speeds can increase the risk that drivers will fail to comply with stop signs or warning treatments. It also appears to rely heavily on recorded incidents, such as serious injuries or fatalities, before fully recognising certain road safety risks.

Inland Rail, as the rail authority responsible for constructing the new railway line, is primarily focused on rail operations. Road-related impacts appear to be considered mainly in terms of how they affect those rail operations. This has resulted in an approach that seeks to minimise road–rail interaction through bridges where possible, with level crossings proposed only where other options have not been adopted.

The proposed level crossings are the aspect of this project that most concerns our community. In approving this State Significant Infrastructure project, the Department of Planning, Housing and Infrastructure has sought to impose conditions to ensure the project meets current safety and environmental requirements. In practical terms, those conditions are intended to make the railway line as safe as possible for the community during its operation and in the community's day-to-day interaction with the new rail corridor. If this modification is approved, we are concerned that local voices will have even less influence over the final crossing treatments. That concern is heightened by the community's view that consultation to date has been inadequate.

“The approach taken by TfNSW and rail and road agencies is to avoid building new level crossings wherever possible given the inherent risk attached to any level crossing, even those with modern active controls.”

This statement, drawn from Transport for NSW's Construction of New Level Crossings Policy, is directly relevant to the proposed new crossings in this project.

Source: Transport for NSW, Construction of New Level Crossings Policy; ITSr, NSW Level Crossing Strategy Council Six-monthly Report covering occurrences to 31 March 2012; and Infrastructure Australia.

Application of ALCAM

ALCAM is a risk assessment model used to guide decisions about upgrading existing level crossings where safety concerns have been identified. It is intended to inform decision-making, but it does not determine whether a crossing is safe or prescribe the treatment that must be applied.

ALCAM does not provide warrants for upgrades or attempt to define a “safe” or acceptable level of risk, nor does it determine what treatments should apply or prioritise works.

Question: So, who decides ????

ALCAM also states that all stakeholders associated with a particular crossing should be involved in determining the final recommended treatment.

Question: Have ALL the stakeholders been involved???

Although ALCAM is a comprehensive tool, it should not be applied in isolation. Several key factors are difficult to assess in this case because the proposed crossings do not yet exist:

- Collision and near-collision history: the road has no existing crossing and therefore has no crossing-related incident history. The road itself also has no recorded accident history.
- Engineering conditions: as an unsealed road, the route is likely to experience significant dust issues, particularly during the summer months. Its east-west alignment also creates sun-glare risks at certain times of the year.
- Local knowledge: meaningful community feedback has not been sought on the proposed crossing treatments.
- Standards and best practice: the assessment should promote current best-practice safety outcomes, rather than rely on outdated road–rail standards. Best practice has changed significantly since the first railways were built in the 1870s. This project represents the first major new railway line of its kind in NSW in more than 100 years, and the crossing treatments should reflect contemporary safety expectations.

Accepting the proposed change to Section E88 would remove “all stakeholders” from the determination of the final treatment. This is inconsistent with the principle that the final treatment should be informed by all relevant stakeholders, including local road

managers and the affected community.

Inland Rail proposes that local stakeholders have a consultation role only. This raises an important question: what weight will be given to local community input if residents, landholders, and community organisations — including NSW Farmers, the CWA, and P&C associations — have not been meaningfully consulted about the treatment options for these crossings?

Local safety concerns

- Unsealed gravel and dirt surfaces create dust, especially during summer.
- The tree-lined road reserve limits practical visibility for motorists.
- The rail line does not cross the road at 90 degrees, further limiting sight lines.
- The east-west alignment exposes drivers to rising and setting sun at various times of the year.
- Two adjacent properties affected by the new rail line will need to use the crossing for livestock and machinery movements because they have limited internal crossing options.
- The area is severely affected by winter fog.

The proponent refers to applying a “so far as is reasonably practicable” approach to level crossing treatments. However, the safety risks identified above appear to be higher than normal due to the road configuration, restricted visibility, dust, fog, and agricultural use. It is unclear how these local conditions have been assessed under that approach, or how current best-practice safety principles have been applied.

Comparison with the Crown Road crossing

There is also an apparent inconsistency in the treatment of the Crown Road (PU11390) crossing. That crossing has been identified as requiring active treatment, even though the main identified risk appears to be that a motorist may not see an approaching train if another train is stopped in the passing loop.

- It is an unformed road with access gates approximately 200m from the proposed crossing.
- Speeds greater than 40k/h can't be achieved
- It provides a direct link for adjoining properties to access back paddocks.
- It provides access for an absentee landowner.

Role of the road manager

The Office of the National Rail Safety Regulator's interface agreement template indicates that the road manager must be involved in identifying, assessing, and managing risks associated with rail or road crossings. Section 5 of that template emphasizes joint responsibility for risk assessment and management.

***5 Identification, assessment and management of risk by a Road Manager - Public Road
- s107 (2) (a) (ii) and s107 (2) (b) – (c) of the Rail Safety National Law***

5.1 *[Insert name of Road Manager(s)] has/have identified and assessed so far as is reasonably practicable, risks to safety that may arise from the existence or use of any rail or road crossing that is part of the road infrastructure of the road because of or partly because of the existence or use of any rail or road crossing that is part of the road infrastructure of a public road OR (Delete as applicable);*

5.2 *[Insert name of Road Manager(s)] has/have jointly with [Insert name of Rail Infrastructure Managers(s)] identified and assessed so far as is reasonably practicable, risks to safety that may arise from the existence or use of any rail or road crossing that is part of the road infrastructure of the road because of or partly because of the existence or use of any rail or road crossing that is part of the road infrastructure of a public road OR (Delete as applicable);*

5.3 *[Insert name of Road Manager(s)] has/have adopted the identification and assessment of the risks to safety that may arise from the existence or use of any rail or road crossing that is part of the road infrastructure of a public road because of or partly because of the existence or use of any rail or road crossing that is part of the road infrastructure of a public road which identification and assessment was carried out by [Insert name of Rail Infrastructure Manager(s)]; and (Delete as applicable)*

5.4 *[Insert name of Road Manager(s)] has/have determined measures to manage so far as is reasonably practicable, those risks referred to and for the purpose of managing those risks has recorded in schedule 3:*

(a) the identified risks to safety;

(b) the risk assessments;

(c) measures to manage the identified safety risks;

(d) the Party responsible for implementation and maintenance of the measures to manage safety risks; and

(e) the timetable for implementation of the safety risk measures.

5.5 *The Parties may amend schedule 3 at any time by written agreement.*

5.6 *Subject to clause 5.5, the Party responsible for implementation and maintenance of the measures to manage safety risks referred to in clause 5 will be responsible for their cost of implementation and maintenance.*

5.7 *A Party may agree to contribute to the funding of the cost of implementation and/or maintenance by another Party of measures to manage safety risks*

Transport for NSW's *Guideline: Planning Road Infrastructure Upgrades at Railway Crossings* also refers to cooperation between parties, rather than consultation only.

The guideline applies while treatment options for railway crossings are still being developed. It does not apply where the recommended treatment is the creation of a new road crossing.

Transport for NSW's *Construction of New Level Crossings Policy* states that permission to build a new level crossing must be obtained from the consent authority:

Under the State Environmental Planning Policy (Infrastructure) 2007, permission to build a new level crossing must be obtained from the consent authority, being the relevant council or, where specified, a Minister or public authority.

Design consultation

The proponent states that Inland Rail's values are

'Commit the organisation to active engagement with stakeholders and the community, and that a comprehensive consultation program has been undertaken throughout the planning and design phases of the I2S Inland Rail project.'

We challenge the accuracy of that statement in relation to level crossing treatments. While individuals have attended the various Community drop-in sessions arranged by Inland Rail, those sessions were primarily concerned with the broader impacts of the rail line on affected landholders and businesses. To our knowledge, attendees were not asked the specific question, what type of level crossing treatments should be developed along this rail corridor.

NSW Farmers — Illabo Branch has repeatedly raised concerns about the proposed passive treatments for level crossings in our local area, including correspondence with our local State and Federal Members and the Minister for Transport, both State and Federal. These concerns have also been raised through Community Consultative Committee meetings, including requests for the relevant ALCAM assessments to be tabled. We were advised that those assessments were internal documents only and could not be obtained even through 'Freedom of Information' legislation.

Residents remain very concerned that passive crossing treatments may not adequately address the safety risks at these locations. In the community's view, implementing passive treatments in these circumstances could create an unacceptable safety risk.

The proposed additional sealing at these crossings, as proposed by Inland Rail to satisfy the community's concerns, does not fully address the overall safety risk. Additional sealed road surface may provide drivers with more time to see a vehicle stopped or train movement at the crossing itself. However, it does not resolve broader visibility concerns, including the ability of motorists to see an approaching train or vehicle in dusty, foggy, or low-visibility conditions.

Justification and road authority role

The proponent refers to the TfNSW Level Crossing Closure Policy, which acknowledges that level crossings are a shared-risk environment.

The policy states that road authorities must be consulted, but it does not confer approval powers on the road authority.

This raises an important question: how can a policy focused on level crossing closure be applied to the creation of new level crossings?

In our view, safety must be the primary consideration in any new construction, particularly under contemporary safety standards. The local road network is essential

to the community, and Junee Shire Council should retain a meaningful role in decisions about its management. ARTC is responsible for the rail network; local road managers are responsible for local roads. The proposed modification would shift practical responsibility for road-related decisions away from the road authority and toward ARTC.

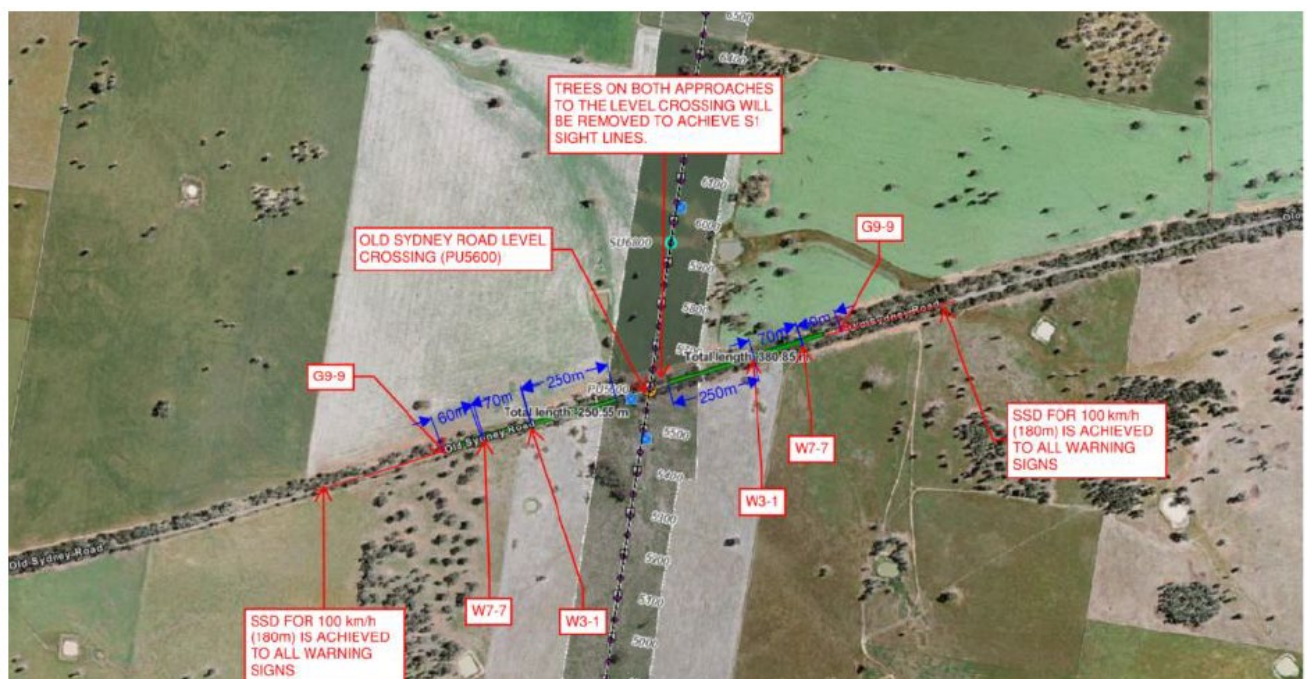
How can we trust their decisions when new paddock access gates don't get proper road access (Annexure 'C') and mesh panels installed on the road edge with no warning/speed restriction signs (Ironbung Road picture pg 19)

ARTC appears to suggest that removing trees from both approaches to the level-crossing (picture next page) will be sufficient to achieve adequate sight lines.

"trees on both approaches to the level crossing will be removed to achieve sight lines"

However, this appears to be primarily a rail corridor requirement, ensuring that trees do not fall across the rail line during storms. It does not adequately address the road safety concern: motorists' visibility will still be affected by the tree-lined nature of the road reserve, see 2nd picture.

This further reinforces our concern that ARTC's assessment gives greater weight to rail operations than to the interaction between the rail line and the adjoining local road network.





Both pictures were supplied by the NSW Minister of Transport

If we look at the 'Planning Road infrastructure upgrades at railway crossings' Guideline

Background

There are more than 3000 railway crossings (RC) in NSW and around 1400 of them are on public roads. Management of an RC involves the road component (managed by the roads authority) and the rail component (managed by the rail infrastructure manager). Roads and Maritime Services (RMS) is involved in managing the road component of RCs on State roads, exercising the powers of a road's authority outlined in sections 62 and 64 of the Roads Act 1992. RMS may also be involved as a stakeholder or funding contributor for Regional and Local roads. Many factors make it necessary to improve RCs. These include changes to rail or road operations, identified risks to safety, non-compliance with standards, road or rail infrastructure manager strategy and other stakeholder interests. Improvements are managed through one of many programs initiated by RMS or other agencies.

Relevance of road infrastructure planning guidance

Based on our review, the *Planning Road Infrastructure Upgrades at Railway Crossings* guideline appears to be the main document that could be applied when planning railway crossing treatments. The guideline is heavily focused on the road manager's role in assessing and planning level crossing treatments.

In this case, the usual circumstances are different. It is highly unusual for a rail authority to propose new level crossings, particularly because NSW has not had a new railway line of this kind built for around 100 years. Inland Rail's 'Greenfield' construction is proposing a new railway line across an existing road network. For that reason, the roles described in this guideline should, in effect, be reversed. The rail network proponent should be required to justify its preferred level crossing treatment to the road manager, and the road manager should retain a meaningful role in approving the treatment required as indicated in various sections throughout the Guideline.

However, it states within the Guideline, on pg 6, that

Other limitations on application

This guideline applies when options for RC treatment are still being developed. It does not apply when the recommended treatment is:

- *RC closure.*
- *Creation of a new RC.*
- *Grade separation.*
- *Maintenance of the existing RC.*

In these circumstances other RMS guidelines should be followed. This guideline only applies to the road component of an RC upgrade.

On Page 22 it also empathizes how ALCAM should be used

The ALCAM model may be used to understand the effect of alternative treatment options. It should be noted that ALCAM is a tool that may be used in risk assessment, however it should not be relied upon to provide definitive conclusions.

If this guideline cannot be used to formulate policy for a new level crossing, the remaining relevant document appears to be the *Construction of New Level Crossings Policy* at Annexure "A". However, that policy does not clearly set out the approval process or procedural steps that should apply when a new level crossing is proposed, especially in this case by a rail authority.

As noted earlier, it is highly unusual for a rail authority to seek approval for a new level crossing. This proposal therefore requires careful scrutiny, particularly because the usual guidance does not appear to clearly address this type of situation.

From Page 12 of the 'National Level Crossing Safety Strategy 2023-2032

No new level crossings, closure and consolidation

This Strategy supports no new level crossings wherever possible, consistent with ONRSR's Level Crossing Policy. This is an important consideration for new or planned railways and roads, extensions to existing railways, and expanding development areas in proximity to railways or planned railways. Opportunities for level crossing closure

and consolidation while minimising adverse impacts to vehicular and pedestrian traffic, should also be actively pursued at both active Prioritise low-cost high-impact initiatives and passive level crossings.

To support this outcome, the Rail Industry Standards and Safety Board has developed a guideline for Consolidation of Public Level Crossings to be implemented at a state and local level. Considered relative to broader network priorities, priority should be given to removing level crossings that have limited road user utilisation, reduce risk on a broader network scale, for higher risk clusters where alternative connections are available and those on closed rail corridors.

Conclusion

NSW Farmers — Illabo Branch opposes the proposed modification to the EIS. Responsibility for control, accessibility, and safety of the local road network should remain with Junee Shire Council, the local roads authority with direct knowledge of community needs, road conditions, and local safety risks.

Local oversight and accountability

Reduced local oversight. Replacing the road authority's endorsement role with consultation would significantly weaken local government oversight of level crossing treatments. It would also reduce the role of local knowledge in final design decisions, including knowledge of road conditions, access needs, and day-to-day safety risks.

Independent verification. The community is concerned about how information supplied to the Office of the National Rail Safety Regulator for the "so far as is reasonably practicable" assessment and other reports can be independently verified. This includes whether any material has been prepared from desktop sources, such as Google Maps, rather than from local, site-based assessment.

Apparent inconsistency. Community members have also questioned the different proposed treatments for Old Sydney Road and Crown Road. This contrast has caused genuine concern in local discussions and has reinforced the view that the proposed modification does not meet basic expectations of fairness, transparency, or practical common sense.

Key unresolved concerns

- ALCAM continues to be relied upon, despite repeated indications that it is intended for existing crossings rather than newly constructed crossings.
- No clear reference has been made to the *Construction of New Level Crossings Policy*, despite its direct relevance to the proposed new crossings. Refer to Annexure "A".
- The proposed treatments for Old Sydney Road and Crown Road appear inconsistent and have not been adequately explained to the community.

- The community has not been given sufficient assurance that local road safety risks, access requirements, and operational conditions will be properly reflected in the final crossing treatments.

In practical terms, the proposed change would allow Inland Rail, as the rail authority, to make final decisions about road-related matters without the agreement of the road authority.

This would be overreach. Although the rail authority may have knowledgeable staff and specialist teams, its primary organisational purpose is to deliver and operate rail infrastructure. Decisions about road-related matters may therefore fail to give sufficient weight to the broader road safety context, including local traffic conditions, access needs, and community safety concerns.

A rail-focused decision-making process does not adequately reflect an inclusive Safe System approach, which requires road safety risks to be considered across the whole local road environment, not only at the point where the rail line crosses the road.

Would the reverse situation be accepted? Would a road authority be allowed to make the final decision on a rail safety matter?

Allowing the rail authority to make final decisions on road-related matters would create an inappropriate imbalance between the road authority and the rail authority.

For these reasons, the proposed change to E88 should not be supported.

ANNEXURE “A”



Construction of New Level Crossings Policy

Purpose

To provide guidance and direction to transport planners and infrastructure managers in the ongoing development and management of the NSW rail network.

Background

Level crossings are the points at which roads and rail meet at substantially the same grade; they can represent significant collision potential for pedestrians, road and rail users.

Although the number of collisions appear to have stabilised in recent years and is at a historically low level, crashes at level crossings have the potential for high consequences.

In addition, there is concern about the number and significance of level crossing safety incidents involving heavy vehicles. Findings from a 2011 national research project show heavy freight vehicles are over represented in collisions at level crossings and the likelihood of fatalities is greater in crashes involving heavy freight vehicles compared to other types of road vehicles. This is also of concern given the projected growth in Australian freight over the next few decades; between 2010 and 2030 truck traffic is predicted to increase by 50% and rail freight is expected to jump by 90%.¹

TfNSW Position

The approach taken by TfNSW and rail and road agencies is to avoid building new level crossings wherever possible given the inherent risk attached to any level crossing, even those with modern active controls.

The Process for Opening a New Level Crossing and Issues to be Considered

Under the *State Environmental Planning Policy (SEPP) (Infrastructure) 2007* (section 84), permission to build a new level crossing must be obtained from the consent authority (the relevant council or, where specified in the *Environmental Planning and Assessment Act 1979*, a Minister or public authority).

The consent authority must give written notice of the development application to the relevant rail infrastructure manager and, before determining the application, take into consideration:

- The implications for traffic safety including the costs of ensuring an appropriate level of safety having regard to the existing traffic characteristics and any likely change in traffic

- affecting the crossing as a result of the development, and
- The feasibility of alternative means of access to the development that does not involve use of level crossings and
- Any comments received from the CEO of the rail authority on the proposal.

The consent authority must only approve the development application if the rail infrastructure manager agrees. The SEPP also specifies that the rail infrastructure manager must consider rail safety and operational issues, and traffic safety issues, before indicating their agreement.

the NSW Department of Planning, *Development near Rail Corridors and Busy Roads – Interim Guideline* (2008), states “new level crossings are to be avoided wherever possible because of their inherent safety risks. Alternative arrangements should always be explored first prior to the option of a new crossing being considered”.

Consequently, developers and other organisations seeking to open a new level crossing should exhaust all other options including grade separation and use of existing level crossings prior to proposing to build a new level crossing. If it is considered that a new level crossing is still required, the organisation will need to demonstrate that they have taken these steps to consider all the possible alternatives to a new level crossing. They also need to provide information about the safety and operational impacts and/or benefits of the proposed new crossing.

If a new crossing is approved, an interface agreement between the relevant road and rail infrastructure managers must be developed under the *Rail Safety National Law (NSW)*. Interface agreements clarify responsibilities for installing and maintaining traffic controls at level crossings.

If a new crossing is approved, it would also be likely that the organisation proposing the crossing would have to obtain a licence from the rail agency for the new crossing. This licence would outline any cost and maintenance responsibilities of the proponent for the new level crossing.

TfNSW and the Level Crossing Strategy Council (LCSC) can be asked to provide advice on proposals for new level crossings.

¹ Sources: ITSIR, *NSW Level Crossing Strategy Council Six-monthly report covering occurrences to 31 March 2012*, April 2012 and Source: [Infrastructure Australia](#)

Annexure “B”

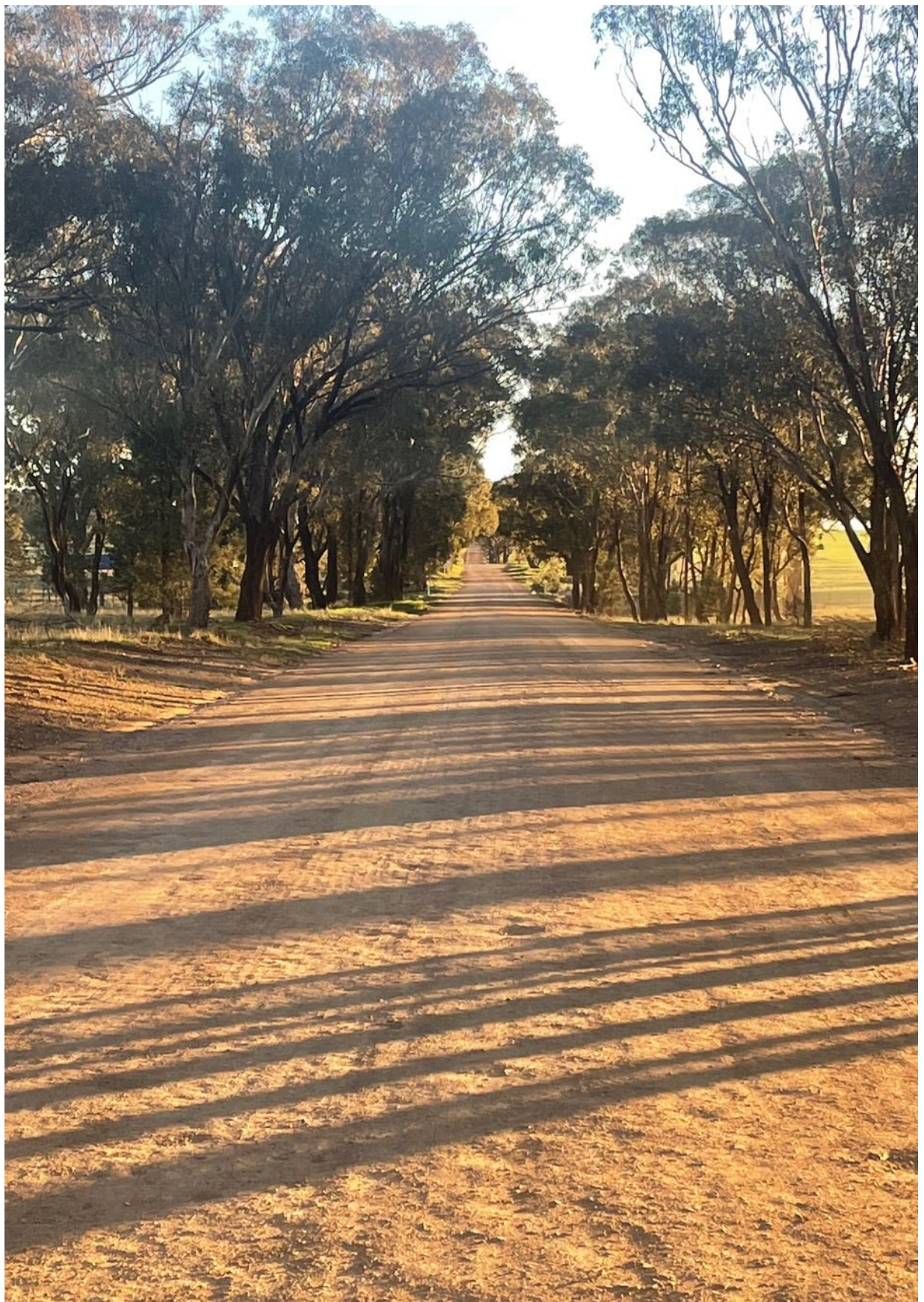
The following pictures and Table give a visual representation of the roads involved in the submission along with a summarised point of view.

- Old Sydney Road
- Ironbung Road
- Crown Road (Paper Road)
- Un-Named Council Road

Old Sydney Road

The first photograph looks east and the second looks west along a straight, tree-lined road. Given the visibility constraints, this crossing should be treated as an 'Active' crossing.





By contrast, Inland Rail's flyover imagery shows very few trees along Old Sydney Road.



Ironbung Road

This photograph looks west and shows the curve in the road, which is proposed to be improved. The 'Active' crossing is expected to cross the road near the fencing panels.



Ironbung Road alignment

Inland Rail's flyover imagery shows the proposed improved alignment.



Crown Road (Paper Road)

These photographs show the unformed Crown Road, which is earmarked for an 'Active' crossing. The first photograph looks east and the second looks west.





The photograph below is taken from Inland Rail's Flyover



Unnamed Council Road

No ground-level photograph is available because the road is located on private land. This image is taken from Inland Rail's flyover of the site and shows the proposed road modification on the left, which is intended to improve visibility.



The following table is a brief summary of the Level Crossings within Junee Shire's section of the I2S section of the Inland Rail Project

	Old Sydney Road	Ironbung Road	Crown (Paper) Road	Un-named Council Road
Inland Rail assessment	Passive	Active	Active	Passive
Road type and condition	Gravel road in good condition.	Sealed road.	Unformed road.	Unformed road.
Road structure and speed environment	Straight gravel road with a 100 km/h speed limit.	The level crossing will be located near a curve in the road.	Maximum achievable speed is approximately 40 km/h.	No specific speed environment noted.
Improvement works proposed by Inland Rail	Extend the sealed section at the crossing to improve visibility in dusty conditions.	Realign the road at the crossing to improve sight distance and increase sealed road width.	No known alteration to the road surface.	Realign the western approach to improve visibility. It is assumed that, as with Old Sydney Road, a sealed section will be laid at the crossing.
Safety issues	There are several safety concerns: • Morning and evening sun at various times of the year due to the road's east-west alignment. • Dusty conditions, particularly during summer months. • Foggy conditions during winter months.	The road surface upgrade and realignment should significantly improve the safety issues associated with this crossing.	The unformed road surface limits excessive vehicle speeds to a maximum of approximately 40 km/h.	The proposed realignment on the western side should improve visibility.

	• Tree-lined sections that may restrict side visibility. • The rail line does not cross the road at 90 degrees, further limiting sight distance. • At maximum sighting distance, a train may take approximately 30 seconds to reach the crossing.			
Vehicle usage	As noted in the traffic report, this road has a very similar usage profile to Ironbung Road.	As noted in the traffic report, this road has a similar usage profile to Old Sydney Road.	Due to the ownership of adjoining properties and the type of day-to-day work undertaken, this crossing may experience no traffic for a day or week, or up to approximately 10 movements per day.	This road currently services the same property. Depending on day-to-day work activities, the crossing may experience no traffic for a day or week, or up to approximately 10 movements per day.
Recommendation	Due to ongoing safety concerns, this crossing should be upgraded to 'Active' protection.	The current 'Active' status is considered appropriate.	If this crossing remains 'Active', consideration should be given to whether the other 'Passive' crossings should also be 'Active' due to their inherent safety issues.	No recommendation recorded.

ANNEXURE “C”

Property Access Impacts



During construction, several properties were bisected. In some cases, landholders were provided with new gateways into blocks that previously had no separate access.

However, providing a gateway alone does not provide practical access. In the example shown, a new gateway was installed, but no formed access track was constructed to connect it to the usable part of the property.

- the access track or road formation should have been completed when the gateway was installed;
- any necessary culvert should have been installed at the same time; and
- appropriate road base should have been provided to make access usable in practice.

Without these works, the landholder may have difficulty accessing the rest of their property, particularly with farm vehicles, machinery, or livestock movements.

This seems to be Inland Rail's Road Management.