

16/09/2022

Director – Freight Assessments and Management
NSW Planning, Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Submitted via portal

Re: Environmental Impact Statement – Inland Rail Illabo to Albury

Dear Sir/Madam

I am writing in response to the Australian Rail Track Corporation's (ARTC) Environmental Impact Statement (EIS) for its proposed Illabo to Albury section of the Inland Rail corridor.

Qube is generally supportive of investment in rail network infrastructure which offers the opportunity to improve network efficiency and productivity, however clarification is sought on some aspects of the proposal as exhibited.

In review the EIS, Qube seeks clarification on the following points:

Weekend possessions

The documentation supporting the proposal includes contradictory statements regarding the length of track possessions. Technical Paper 1 – Traffic and Transport (p161 and elsewhere) states that it is proposed that work will be undertaken in "...existing scheduled weekend rail corridor possession periods (typically 72 hours) ..." while there are other references to work being undertaken in the existing 60-hour possessions (e.g. EIS, Ch 8, p8-9).

Existing works in the corridor are currently undertaken during weekend track closedowns of up to 60 hours, not 72 hours, and any extension beyond the existing 60-hour periods would have a significant impact on freight and logistics supply chains.

Qube requests that ARTC confirm that the work will be undertaken within the existing track possession regime (as set out section 8.4.1) and there is no plan to extend beyond the existing 60-hour track possessions.

Qube does not support any extension to the existing weekend possession arrangements (i.e. two 60-hour possessions annually).

Junee

The proposal includes the construction of a new, double stack clearance overbridge to replace the existing Kemp street bridge. Construction is anticipated to take around 10 months.

The EIS (Technical Paper 1 - section 5.4.7.2) refers to works being undertaken during weekend rail corridor possession periods (see comment below above regarding possession windows) and during 9-hour windows when “train services are not scheduled”.

Within Junee yard, Qube requires access to two sidings which it leases from the ARTC. On-going access to both the northern (Sydney) and southern (Country) ends of these two sidings is required to support Qube’s day-to-day operations. As ARTC timetables (or schedules) do not specifically identify trains operating into and out of the two sidings or associated shunting operations, Qube seeks confirmation that ARTC will not adversely impact its operations during construction.

In addition, also Qube requires regular access to the Junee Railway Workshop for locomotive provisioning (fuel, sand, oil and water) and to support on-going maintenance activities. Like shunting, these operations are not timetabled.

Qube notes the EIS statement (Technical Paper 1 – section 5.4.10, p257), “work during these periods would be undertaken in consultation with freight operators. However, it is not expected that proposal construction works would impact upon the rail freight network.” Accordingly, confirm is sought that on-going access to the Workshop will be maintained throughout the project given the significant detrimental impact on Qube’s operations from being unable to access fuel, sand and water for locomotives, or access the Workshop during its operating hours.

Qube does not support 9-hour possession windows which adversely affect shunting operations within Junee yard or access to the Junee Railway Workshops.

Harefield

Qube Logistics owns and operates the intermodal terminal at Harefield. The site currently supports the movement of export agricultural and manufactured products in containers to Port Botany. Some of the activities on site are likely to relocate to a new terminal at Bomen in the near future, with some operations remaining on site at Harefield.

Qube seeks confirmation from ARTC that rail operations on the Harefield siding will not be disrupted outside the proposed weekend possessions and that any scheduled services will be unaffected.

Confirmation is also sought regarding the level of access ARTC requires to Qube land at Harefield (as shown in figure 8-11) to support project delivery. Information is also sought on the arrangements to any mitigate impacts to Qube's terminal operations.

Yours sincerely

Nicholas Angelos
National Rail Access Manager