

Turvey Park NSW 2650

27 September 2022

ATTN: Max Obiakor, Contact Planner, INLAND RAIL

RE: SUBMISSION concerning the EIS

Introduction

We live in Macleay St, Wagga, and will be impacted by the proposed current route for the Inland rail project.

We are concerned about the negative impacts on the community during construction and in operation, of the proposed route through the middle of Wagga.

Consideration should be given to an alternative route which will reduce impacts.

Specifically, we object to the current proposed route on the following grounds, and make the following comments:

1. There has been inadequate community consultation about the impacts on the community of the Wagga section of the project.

ARTC wrote to us on 8 July 2022 to advise us that our home is within the construction impact zone. This was our **first** direct contact from the ARTC. ***Why are we being advised of the Construction Impact Zone in July when the EIS Consultation period ends in September?***

Prior to that we have not been provided with information about how we can engage with the Wagga representatives of the Community Consultative Committee (a forum for open conversation between the Inland Rail project team, the local community, stakeholder groups and local councils on issues directly relating to the Albury to Illabo project <https://inlandrail.artc.com.au/building-inland-rail/working-with-communities/community-consultative-committees/a2i-ccc/>)

Based on our experience and the public community response since the EIS information meetings, we consider the consultation process has failed to meet the ARTC's own objectives stated in the EIS for effective communication and stakeholder engagement (see: *5.1 Engagement approach, objectives, and strategy, part 5.1.1 Overall approach and objectives*).

In our opinion ARTC has not provided:

- *early and regular engagement*
- *meaningful avenues for input*
- *inclusivity—ensuring relevant stakeholders are consulted or involved*

- *equitability*—relevant groups are included in the conversation with recognition of those voices that are not often heard as much as some others.
- *responsiveness*—including communication of how the engagement process has shaped the proposal, prior to each phase of engagement and delivery.

It may be statistically accurate to state that the median age in Wagga is 35 years and conclude that the population will have future resilience to the proposed route ([*A2I EIS – Chapter 13 Social \(nsw.gov.au\)](#) pp 13-25 Community cohesion – social severance), however in *real terms* in our immediate neighbourhood there are many age groups including the elderly, retirees, students and families with young children and school aged children.

Also, several disadvantaged and/or vulnerable groups were referred to in the EIS, but it is not clear how these groups were consulted in any meaningful way.

*We are concerned that disadvantaged, vulnerable and impacted groups have not been given relevant, timely information and **assistance in making submissions** given the short timeframe.*

There are three schools (Kindergarten to Year 12) near the proposed route. These schools will surely be concerned about noise, vibration, visual and health impacts, and inconvenience and separation from services during both construction and operation. After 2040, the ARTC estimates that trains may be up to 3.6kms long and the number of trains will increase to over 20 trains a day (A2I EIS – Chapter 1 Introduction - nsw.gov.au). Trains travelling through Wagga are currently up to 1.7kms long and 12 trains per day.

We are concerned about how the effects on school children have been considered in planning of this proposed route, given the proximity of schools to the rail line and the expected increase in vibrations, sound and visual impacts due to the increased frequency of rail traffic.

COMMENT:

The Wagga community should be able to participate in open and informative community engagement sessions. We believe ARTC should implement an improved round of community consultation.

2. Longer delays caused by trains at level crossings will increase safety risks.

Increasing the length of trains and the number of trains will increase delay times at level crossings (A2I EIS – Chapter 1 Introduction - nsw.gov.au). Recent measurements of the time taken for trains to travel through road crossings by Wagga

Wagga Council indicate that some trains will take longer at rail crossings than predicted.

This is a real danger to the community because delaying and diverting Ambulances, Police and Fire Fighters at road crossings could have potentially fatal consequences.

COMMENT:

- **Bridges should be built over the existing rail crossings to separate road and rail traffic.**
- **The alternate route from Bomen to Kapooka on the western side of Wagga will eliminate many negative social and environmental impacts.**

3. There has been Insufficient Planning for Future Growth.

Wagga's population is estimated to grow from 67,000 to 90,000 by 2036 - less than 15 years (see: [Wagga Wagga Master Plan \(shared-drupal-s3fs.s3-ap-southeast-2.amazonaws.com\)](https://www.amazonaws.com) p9), and Council is expecting Wagga's population to grow to about 100,000 within the next 25 years.

The current proposal places the inland rail through the heart of the residential areas of Wagga Wagga. The alternative route between Bomen and Kapooka bridge on the western edge of Wagga avoids most of the densely populated residential areas.

The potential medium density development of lots close to the CBD (see: Wagga Wagga DCP 2010, section 9, version 25, page 3) will increase secondary dwellings and population density. This future development will exacerbate the social impacts and severance aspects identified in the EIS. This growth is not clearly identified in the EIS and may be difficult to model at the present time.

The EIS must incorporate this planned growth to minimise future social and environmental impacts.

COMMENT:

- **Further strategic planning is required to incorporate future growth and minimise unforeseen environmental, social, and economic impacts of the proposed route.**
- **The alternate route from Bomen to Kapooka on the western side of Wagga will eliminate many negative social and environmental impacts.**

4. There will be unacceptable construction impacts for the Wagga community from the current proposal.

(a) Edmondson Bridge Changes

The new bridge is proposed to be 2.8 metres taller than the current bridge (see TABLE 7-5 NEW ROAD BRIDGES - ALBURY TO ILLABO ENVIRONMENTAL IMPACT STATEMENT 7-7) and the diagram suggests that the bridge approaches will also be shorter and therefore have steeper grades.

During construction, Edmondson St bridge work could potentially close the road for up to a year. Construction noise during the day and some nights will occur for the people living, working and studying near the bridge. This includes the residents as well as staff and students at South Wagga Public School, Kildare Catholic School and Wagga Wagga High School. (A2I EIS – Chapter 15 Noise and vibration (nsw.gov.au) page 26)

(b) Increased traffic in School Safety Zones must be adequately addressed.

During the proposed construction, Traffic volumes in northern Macleay Street are forecast to more than treble from LoS A (7) to D (22), (see: TABLE 9-21 OVERVIEW OF LINK CAPACITY OF ROADS IMPACTED BY ROAD CLOSURES AND DIVERSIONS—EDMONDSON STREET BRIDGE, page 9-20).

There are already serious safety concerns at the northern end of Macleay Street. This section passes through **three School Safety Zones** of Wagga Wagga High, South Wagga Public, and Kildare Catholic School. Wagga TAFE is also located in Macleay St directly opposite Wagga High School pick up and drop off area. (See attached map)

Visibility at the Macleay St / Coleman St intersection to the east is limited for low vehicles due to the descending concave surface of Coleman Street. **This represents a potential collision risk with increased traffic volumes.**

There is no obvious reason for closing Edmondson Street between Erin and Coleman Streets.

During the proposed construction, should Erin Street be closed, the increasing traffic volumes at the northern end of Macleay St will require site specific management including traffic calming as part of the project.

We would suggest **not to close** Erin Street during construction for safety reasons, and to consider minimising any period of closure of Erin Street to reduce traffic in the School Safety Zones.

Map Showing SCHOOL SAFETY ZONES requiring traffic restrictions

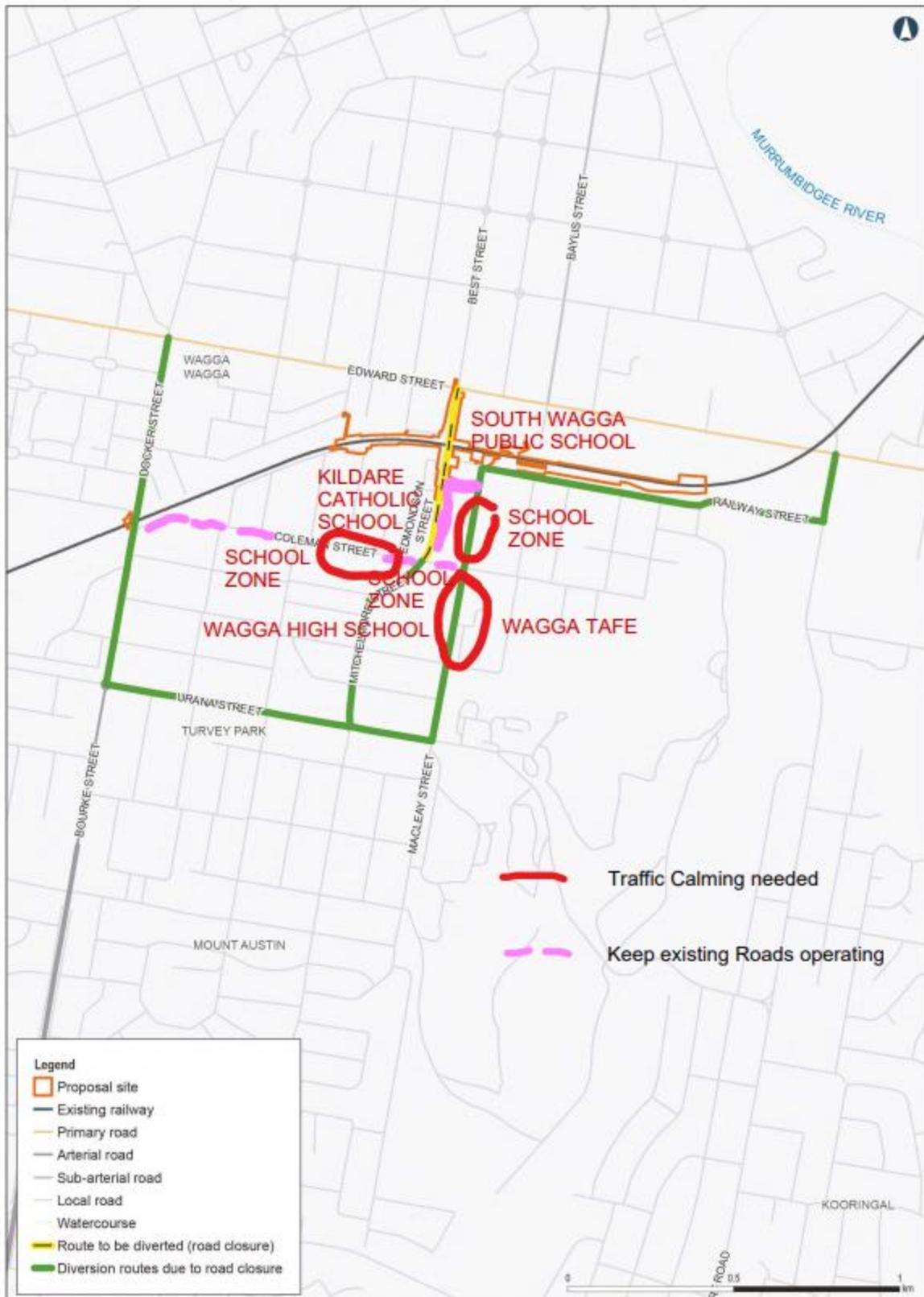


Figure 9-13 Road diversions due to closure of Edmondson Street, Wagga Wagga

Data Sources: ARTC, NSWSS

Coordinate System: GDA 1994 MGA Zone 55
Scale: 1:15,000
Paper size: A4
Date: 4/11/2021

210_EAF_13013_ClosedDiversionRoutes_EdmondsonSt_v12.mxd

During proposed construction, the proposed closure of Erin Street is forecast to treble traffic volumes in an educational precinct at the northern end of Macleay Street. More thought needs to be given to keeping alternate roads open and/or reducing road closures during peak hours. The ARTC should work closely with Council and residents and schools to install traffic calming measures in the area prior to bridge construction. (See attached map)

During proposed construction, the Edmondson Street Bridge works should be staged over time. Keeping Erin Street open as long as possible during the construction of the southern approach only, would reduce traffic congestion and improve safety in the school zones.

COMMENT:

- **Erin Street should remain open during the construction period, if possible. If not possible, then only close Erin Street for a short period during construction of the southern bridge approach.**
- **Traffic calming measures are required in the School Safety Zones impacted by diversions.**

The section of Macleay Street between Wagga High School and Wagga TAFE is already very congested during school hours. Increasing traffic in this area increases the risk of accidents with potentially fatal consequence. Accordingly, there is no clear reason for increasing traffic in this congested student pick up and drop off zone. It is safer for traffic to continue using Mitchelmore Street, between Urana and Coleman Streets. (see: attached plan showing School Safety Zones for traffic calming)

COMMENT:

- **During construction it is safer for traffic to continue using Mitchelmore Street between Urana and Coleman Streets.**

Can the ARTC confirm that after construction of the Edmondson Street bridge that access to Erin Street will be reinstated immediately to its original status and it will be enduring.

COMMENT:

- **When the Edmondson St bridge construction is complete the existing level of east-west traffic along Erin Street must be reinstated *promptly* and be *enduring*.**

Bridge closed signs and diversion notices should be placed at the Mitchelmore / Stanley Street intersection and Bourke / Coleman Street intersection to reduce traffic flows along School Safety Zone during the Edmondson Street Bridge works.

COMMENT:

- **Give consideration to placing 'bridge closed' signs and diversion notices at Mitchelmore / Stanley Street intersection, Macleay / Urana Street intersection and Bourke / Coleman Street intersection to reduce traffic flows along School Safety Zones during the Edmondson Street Bridge construction.**
- **Adopting the alternate route from Bomen to Kapooka on the western side of Wagga will eliminate many negative social and environmental impacts.**

SUMMARY

1. There has been inadequate community consultation about the impacts on the community of the Wagga section of the project.
2. Wagga community should be able to participate in open and informative community engagement sessions. We believe ARTC should implement an improved round of community consultation.
3. Longer delays caused by trains at level crossings will increase safety risks for the whole community.
4. Bridges should be built over the existing rail crossings to separate road and rail traffic.
5. The alternate route from Bomen to Kapooka on the western side of Wagga will eliminate many negative social and environmental impacts.
6. Strategic planning is required to incorporate future growth and minimise unforeseen environmental, social, and economic impacts of the route.
7. There will be unacceptable construction impacts for the Wagga community from the current proposal.

8. Erin Street should remain open during the construction period, if possible. If not possible, then only close Erin Street for a short period during construction of the southern bridge approach.
9. Traffic calming measures are required in the School Safety Zones impacted by diversions.
10. During construction it is safer for traffic to continue using Mitchelmore Street between Urana and Coleman Streets.
11. When the Edmondson St bridge construction is complete the existing level of east-west traffic along Erin Street must be reinstated *promptly* and be *enduring*.
12. Give consideration to placing 'bridge closed' signs and diversion notices at Mitchelmore / Stanley Street intersection, Macleay / Urana Street intersection and Bourke / Coleman Street intersection to reduce traffic flows along Macleay Street School Safety Zones during the Edmondson Street Bridge construction.

CONCLUSION

Adopting the alternate route along the western side of Wagga from Bomen in the northeast to Kapooka Bridge in the southwest will eliminate many negative social and environmental impacts. For these reasons we ask that ARTC reconsider the current proposed route.