

Submission to the
Environmental Impact Statement
Albury 2 Illabo
Inland Rail Project

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On Behalf of

- Myself and as
- Chair, NSW Farmers Association Illabo Branch

This submission principally deals with the Junee Shire section of this EIS report as that is the part that I'm most interested in. I may in some sections draw reference to other sections if I feel that they are relevant.

Tech Paper 1 –

Transport and traffic

OPERATIONAL IMPACTS The proposal would allow for increases in rail services, with an increase between 2025 and 2040 of up to two daily services. Preamble

QUESTION: all the paperwork suggests a greater train usage now it says only 2 extra per day??

An increase in the number of daily train numbers and therefore the number of times level crossings on public roads are activated is expected during the operation of the proposal. It is anticipated that the maximum closure time encountered at a level crossing (with or without the proposal) would be 121 seconds. An assessment of active level crossing LOS was undertaken and found that all level crossings on public roads will operate at a delay-based LOS of A.

QUESTION: The trains may be faster, but they are also longer. I don't see this has holding true, especially at the central crossing in Junee when you have a lot of other factors in play?

OPERATIONAL IMPACTS The proposal would allow for increases in rail services, with an increase between 2025 and 2040 of up to two daily services. As the proposal solely provides enhancements to the existing rail line, operational impacts would be associated with: — increased daily train services resulting in an increased frequency of closures per day at level crossings — increased delay where level crossings have been upgraded from passive to active. The proposal would not generate additional traffic during operation; as such, no impacts to the road network performance during operation of the proposal from vehicle movements would occur. An increase in the number of daily train numbers and therefore the number of times level crossings on public roads are activated is expected during the operation of the proposal. It is anticipated that the maximum closure time encountered at a level crossing (with or without the proposal) would be 121 seconds. An assessment of active level crossing LOS was undertaken and found that all level crossings on public roads will operate at a delay-based LOS of A. Amendments to the road network as part of the permanent works will not remove any existing turn movements and are not expected to impact on the current capacity, level of service or safety of any intersections. Short stacking deficiencies at the existing level crossings were assessed and some potential storage deficiencies identified. It is noted that all operation impacts would be expected to occur with and without the proposal, however the potential occurrence of these impacts is expected to increase due to the increase in average rail services per day

QUESTION: Very interesting statement by saying that things won't change WITH OR WITHOUT THE PROPOSAL. How can this be?

Junee

- Harefield Yard clearances
- Kemp Street bridge
- Junee Station pedestrian bridge
- Junee Yard clearances
- Olympic Highway underbridge
- Junee to Illabo clearances

1.2.2 KEY FEATURES

The key features of the proposal include:

- adjustments to approximately 44 kilometres of track across 14 enhancement sites to accommodate the vertical and horizontal clearances according to Inland Rail clearance specifications, comprising:
- realignment of track within the rail corridor
- lowering of track up to 1.6 metres at three enhancement sites
- changes to bridges and culverts at enhancement sites to accommodate vertical clearances and track realignment as

follows:

- replacement of two road bridges and adjustments to adjoining intersections
- replacement of three pedestrian bridges
- removal of two redundant pedestrian bridges
- modifications to four rail bridges
- ancillary works, including adjustments to nine level crossings, modifications to drainage and road infrastructure, signalling infrastructure, fencing, signage, and services and utilities.

No additional works would be required outside the enhancement sites identified in Figure 1.1 as they meet the clearance

requirement for the Inland Rail program.

1.2.3 TIMING

Subject to approval, further design and procurement, construction of the proposal is planned to start in early 2024 and is expected to take about 16 months. The proposal would be fully operational in 2025 with enhancement sites progressively commissioned on completion of construction. Inland Rail as a whole would be operational once all 13 sections are complete, which is estimated to be in 2027.

1.3 PURPOSE AND SCOPE OF THIS REPORT – pg 6

From Table 1.3 SEAR's – Transport and traffic

ASSESSMENT REQUIREMENT

3) Assess the feasibility of level and grade-separated crossings along the project alignment (existing and proposed) and justify the safety and operational impacts and/or benefits of the proposed crossing type, taking into account the NSW Government's Construction of New Level Crossings Policy.

REPORT REFERENCE

The assessment of level crossings feasibility has been undertaken separately to this transport impact assessment; it is discussed in section 6.3 and the process undertaken by ARTC is provided in section 3.3 and Appendix A. Operational impacts of level crossings are assessed in section 6.3.8

4) In the assessment of level crossings, the EIS must:

b) demonstrate how the risks would be reduced So Far As Is Reasonably Practical (SFAIRP) in consultation with the relevant road authority.

The assessment of safety of level crossings has been undertaken separately to this transport impact assessment; it is discussed in section 6.3 and the process undertaken by ARTC is provided in Appendix A.

Table 4.2 Adopted growth rates -- pg 29

WORK PRECINCT ADOPTED GROWTH RATES DISCUSSION

Albury

3% – Highways

2% – Other roads

As per TfNSW advice and highest observed Hume Highway historical growth rate for state controlled roads. As per Albury City advice for local roads.

Greater Hume – Lockhart

3% – Highways

3% – Other roads

As per TfNSW advice and highest observed Hume Highway historical growth rate.

Wagga Wagga

3% – Highways

3% – Other roads

As per TfNSW advice and highest observed Hume Highway historical growth rate.

Junee

1.5% – Highways

2% – Byrnes Road

1% – Other roads

As per Junee Shire Council advice.

QUESTION: I question why Junee Shire's suggested growth rates so low considering that the other 4 local government areas are allowing a 3% increase on Highways NOTE: Junee is serviced by the Olympic Highway.

- Wagga's proximity to the Hume is not relevant to this study as the highway is miles away from the railway upgrade
- Lockhart Shire is nowhere near the Hume but on the Olympic
- Byrnes Rd should have a higher growth rate, than the 2% predicted, due to its link between Wagga and Junee and its closeness to the Bowman Precinct
- Why is Lockhart associated with Greater Hume when they are totally different areas with different traffic patterns
- One would assume that
 - The Olympic Highway traffic in Lockhart from The Rock to Wagga
 - And The Olympic Highway traffic from Temora and Junee to Wagga
 - Would be the same considering that they are both important links to Wagga so why does one have 3% and the other 1.5%
- Why is the Hume always mentioned when the Olympic Highway follows the railway line all the way

5.4.1.1 CONSTRUCTION PROGRAM pg 229

Key construction stages and work durations at each enhancement site within the Junee precinct are summarised below in Table 5.38 and Figure 5.34.

Harefield Yard Clearances has a construction time frame of 1st Feb 2024 to 2 April 2024

This time frame is at the end of our Bush Fire Season with the surrounding countryside is susceptible to fire risk

QUESTION: What provision is there to minimise fire risk during this construction time frame

- The farming community needs a fire permit till the end of March before they can light a fire during this time
- No fires at all can occur during Total Fire Bans
- Permits are discouraged during days of High Fire Danger
- Will a 'Hot fire permit' be permitted during this period?

Junee to Illabo Clearances has a construction time frame of 15 January 2024 to 6 November 2024

QUESTION: The same as for Harefield in relation to fire risk

- Our Bush Fire danger period runs from 1st November to 30th March every year.

Table 5.39 Peak hour construction movements – Junee Work precinct enhancement sites – pg 236

Olympic Highway underbridge requires 'on-street parking may be utilised

QUESTION: There is very little scope for on-street parking in the vicinity of the underbridge and what parking there is could be considered dangerous to the parkers and the travelling motorist.

June to Illabo Clearances also requires "During possession peak some on-street parking may be utilised"

QUESTION: Any on-street parking could be located on the Olympic Highway in a 100k speed zone, but no mention of safety protocols?

TEMPORARY CLOSURES AND DIVERSIONS -- pg 239

As shown in section 5.4.1, the replacement of Kemp Street bridge would require approximately 11 months of construction activity.

Note: all assumptions are based on the scenario that the foot traffic over Kemp St bridge won't change

QUESTION: Who are the pedestrians that use Kemp St Bridge

- Are they school children that walk to school
 - Will they continue to do so by walking the extra distance via the central crossing to school or
 - Will they start getting driven to and from school therefor increasing traffic counts across the central crossing
- What is the reason for this proposed increase in vehicle traffic
 - Because they fall outside the free bus pass access?

Should provision be made for the local bus company to be reimbursed

From the top of pg 242

It is noted that the level crossing on the Olympic Highway in Junee closes more regularly and for a longer duration than other level crossings in the study area due to rail operations at the rail yard to the south of the crossing. Data for the crossing in August 2021 (31 days) has been used to determine the number and frequency of level crossing closures during the peak traffic period (3:15PM to 4:15PM). The data showed the following: — the average closure time during the traffic peak hour was under 3 minutes — the average number of closures was less than one in a peak traffic hour. To provide a conservative assessment of additional (diverted and construction) vehicles impacted by the crossing closures, it has been assumed that the crossing closes once during the peak hour for a duration of three minutes. Three minutes is equivalent to 5% of the peak hour. Therefore, it is assumed that 5% of peak hour road traffic is affected by the crossing closure. The total number of vehicles two-way (with and without the diversion) is shown in Table 5.43.

Statement: it seems an unusual scenario that the 'peak hour' is in the middle of the afternoon?

- Where are the traffic counts have been done to support this?
- If this peak hr is the afternoon school pick up? Why isn't there a morning peak?
- Where are the times for trains that use this crossing?

- You don't give any reason as to why this crossing closes more regularly than normal
- With inland trains running faster through this crossing how does this effect the timing of the lights and the location of signal triggers with shunting trains travelling slower etc.

QUESTION: from the above statement How can you have 2 different types of trains using this crossing. How can the same signalling system cater for both??

Intersection Performance on pg 243

Humphrys Street/Peel Street

A proportion of diverted traffic (non-Olympic Highway) would use this intersection to continue south.

Expected traffic impact

Due to the low estimated volumes on Humphrys Street, this intersection is expected to have sufficient capacity for a proportion of diverted traffic with minimal impacts due to diversions expected.

Statement: it seems that IR expect that all the traffic coming from Kemp St to the central crossing will keep going up Main St, Olympic Highway. I really question this statement as all local traffic, which used to use the Kemp St Bridge would be using Humphrys St for access to the newsagency, post office etc. This along with the heavy trucks needing to connect with Byrnes Rd

QUESTION: where are the traffic counts that support there argument as against local knowledge?

6.3.5 LEVEL CROSSINGS – SHORT STACKING ASSESSMENT

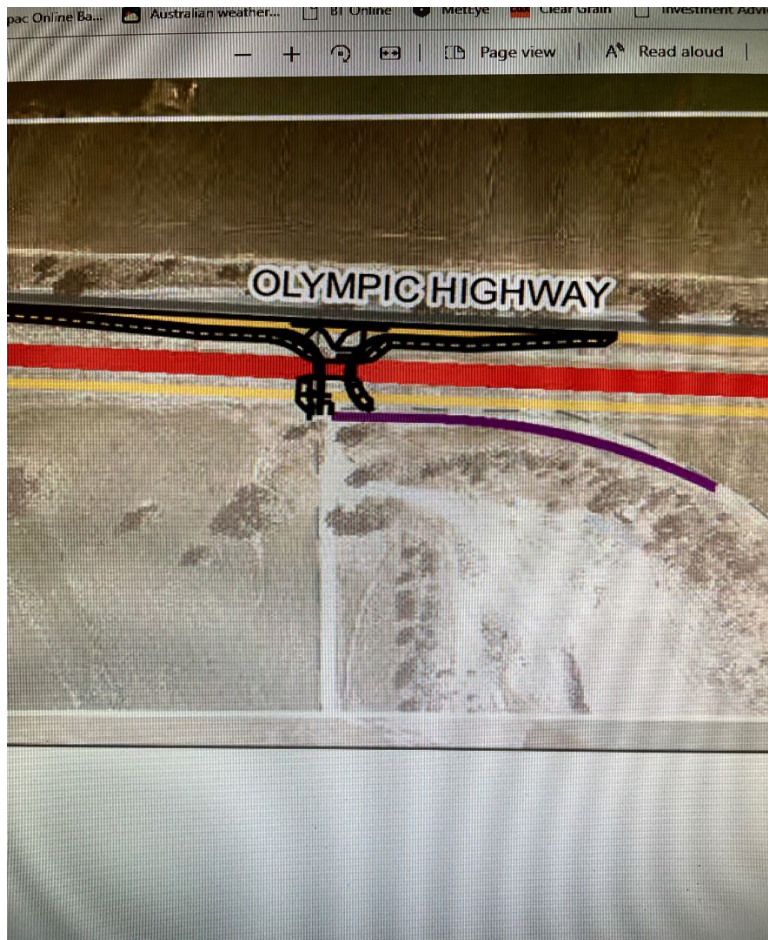
- Sladen St, LX625 – ARTC is continuing to consult with TfNSW, however
- Private Crossing, LX605 – no consultation with the owners but told what they are getting

The assessment that crossing LX 605 also needs concrete barriers as per picture when the proposed alterations will

- Severely impact on the usage of the crossing by the occupiers
- Create a traffic hazard on a major state highway, the Olympic Highway.

The below photo taken from Figure 7.20 key features of Junee to Illabo clearances pg 25 of 29
Chapter 7 Proposed features and operation

QUESTION: why does one crossing get a different treatment than the other and won't these concrete barriers present a traffic hazard on the Olympic Highway?



6.10 ACTIVE TRANSPORT ROUTES – pg 270

As discussed in section 6.2, there would be no increases to road traffic as a result of the proposal. Enhancements of pedestrian rail crossings provide additional connectivity and Disability Discrimination Act (DDA) compliance for pedestrians and cyclists through the enhancement of active transport infrastructure at locations shown in Table 6.7. These enhancements may also help local councils achieve objectives for improving active transport infrastructure, such as those outlined in the Wagga Wagga Active Travel Plan

Statement: It seems that all the bridge upgrades, except Kemp St, have DDA compliance.

QUESTION: Why then can all the other bridge upgrades can have plans in place for DDA compliance whereas Kemp St after all the asking, through the Community Consultative meetings and discussions with Junee Council, still can't get a firm commitment for a DDA walkway?

Impacts on existing roads – pg 282

Consultation with Junee Shire Council will be undertaken regarding the potential for preventative road works, prior to road diversions in Junee on Joffre Street and Pretoria Avenue, to offset impacts from higher than typical traffic and heavy vehicle movements on some local roads due to diverted traffic.

QUESTION: what about all the extra traffic that will occur on Humphrys and Lorne Streets??

Road – Rail Interface

From pg 18 of 23 Chapter 6 Alternatives and proposed options

Opportunities for grade separation ARTC's policy is that rail–road interfaces would be automatically grade separated in the following three instances:

- } rail–road crossings with four rail tracks
- } rail–road crossings of freeways and highways of four or more lanes (current and committed future plans)
- } where grade separation is the preferred option for topographical or engineering reasons.

Within the proposal site, there are no level crossings that fall into these categories. All level crossings occur for local or two-lane roads (and highways), and at areas of relatively flat terrain

STATEMENT: Inland Rail are saying that no level crossings within this EIS proposal fall into the above categories. What about the Central Crossing near the Junee Railway Station that has four tracks.

QUESTION: Why then doesn't this crossing warrant a different road-rail interface?

Olympic Highway underbridge from pg 17 of 23 in Chapter 6 Alternatives and proposed options

- ☐ Minimal track and structure works (Option 1)
- ☐ Bridge replacement (Option 2)
- ☐ Bridge replacement (superstructure only) (Option 3)
- ☐ Track reconfiguration (Option 4)

In comparison to the other options, Option 4 was selected as the preferred option as in comparison to the other options it:

- ☐ minimises construction noise and amenity impacts associated with more substantial works
- ☐ minimises impacts to the operation of the Olympic Highway
- ☐ eliminates the requirement for a raised bridge, which would result in substantial track lift works on the bridge approaches. This would also significantly impact rail operations during construction
- ☐ minimises construction complexity when compared to Option 2 and Option 3, given less work would be required on the underbridge structure☐ reduces vegetation clearing requirements
- ☐ removes the need for a waiver for horizontal clearances, when compared to Option 1.

QUESTION: Why wasn't an ALCAM assessment done on this underbridge and what were the findings of any assessment tabled instead of a preferred option?

STATEMENT: I have series concerns with the methodology used in the determination of Option 4. They have taken the easy way out in determining the final solution in this proposal.

In general, this underbridge is a traffic hazard waiting for a major accident to happen. We have asked numerous times

- What is the life span for the current bridge
- Will the current structure withstand longer, heavier and faster trains travelling over it especially now that it is being converted to single track usage.
- Will this single-track usage shift the bracing load factors to a different set of load bearing specks from its original design specifications
- I read, in another section, that one of the embankments needs structural work now. Why not the other one

QUESTION: Has an ALCAM assessment been done on this crossing

Consideration of factors other than ALCAM that may influence the recommended level of control are also taken into account, where relevant, on a case-by-case basis, including:

} Collision and near-collision history

} Traffic and transport impacts

} Local knowledge of driver or pedestrian behaviour

My assessment

- Underpass has low height limit, 4.5m, which restricts heavy vehicle moments.
- Heavy vehicle volumes: 378 Heavy Vehicles, including 76 Articulated
- The Olympic Highway carries a large number of heavy vehicles through Junee that passes through this underpass with limited clearance. Higher vehicles must find a different route through Junee, most likely via Old Junee Road or Broadway.
- Trucks have been 'caught' under the bridge having to back out in order to clear the structure
- The Olympic Highway comes through this structure on 'an angle' requiring trucks to cross the centre line in order to get through.
- Heavy truck usage is becoming greater as these types of vehicles are becoming more common, especially by primary producers for the operation of their business.
- The Pedestrian walkway is narrow with an unsuitable safety barrier. This walkway is used by
 - School children attending North Junee Primary School
 - Walkers in general
 - It is part of Junee Shire's walking path network linking the township of Junee in a circular pattern.
- Junee Shire Council, by motion, wants to see this underbridge enlarged in order to improve its safety
- I believe it is mentioned in RERO'S Transport Study, low clearance and bad road angle
- It is mentioned in Junee Shires Draft Freight and Transport Plan – Draft traffic Study Report. It is an area of concern

Future prospects after the proposed modification takes place All of the above concerns are still there. However, they are increased by

- Larger trucks using this structure resulting in a greater chance of a major collision with the under story of the bridge resulting in major delays for rail and road movements
- Based on a 3% traffic growth rate a greater chance of a collision under the bridge
- With single-track usage compounded by track points each side of the bridge, dual track usage, and with trains traversing these points at 80k/h, these points are rated for this speed, and trains 1.8k long the likelihood for
 - Trains derailing increases
 - The overall integrity of the overall bridge structure becomes questionable.
- The likelihood of pedestrians being impacted by a vehicle going through the safety fencing is greater

As the photos below indicated, there is not much clearance



In Conclusion

I find this EIS is missing important information and is only concerned with its own works and not how it will affect the broader community.

Some of the information still missing is

- Where are they going to get the water from for dust suppression etc
- Where are they going to stockpile the large quantity of material needed for the Junee section upgrades