

Submission to NSW Department of Planning, Industry and Environment.

Submitted by: Chris Roche – President
Wagga Residents & Ratepayers Association

A copy of this submission has been sent to:

- Minister Catherine King, Minister for Infrastructure, Transport, Regional Development and Local Government
- Dr Joe McGirr, Member for Wagga Wagga
- Mr Michael McCormack, Member for Riverina
- Councillor Richard Foley, Wagga Wagga City Council

Please note that the Wagga Residents & Ratepayers Association, along with the Rural Ratepayers Association, acknowledge the benefits that the Inland Rail will bring to the city of Wagga Wagga and its surrounding communities. The reason for this submission is to acknowledge the financial cost and impacts to the residents of Wagga of the Inland Rail using the current route through the centre of Wagga. We are asking for a Bypass to be considered. Whilst the costs of the proposed rail bypass could be above \$500 Million, what are the total costs of the proposed upgrades to the infrastructure and then add in any future remediations required by the impacts of the Inland Rail coming through the centre of Wagga. And then add in the personal costs to the residents of Wagga, being damage to surrounding houses, mental and physical health impacts, and the long-term impacts as the city of Wagga Wagga grows to beyond 80,000 residents post 2040.

However, the concerns with the Preferred Infrastructure Report (PIR) are:

1. PIR omissions:

a. North Wagga Viaduct

The Wagga Residents & Ratepayers have concerns as to the structural integrity of the rail viaduct located at North Wagga between Bomen to the Murrumbidgee River. The concern raised by many residents is that, due to the aging structure, the viaduct may not be structurally sound enough to handle the extra Inland Rail freight trains.

For this reason, we have been asking for the apparent engineering report that attests to the structural integrity of this viaduct.

We have requested this report from:

- Mr Robert Rust, acting Chief Executive, Inland Rail by email on 8th November 2023
- Mr Kurt Uebergang, ARTC Engineer, Inland Rail Public Forum, Wagga Wagga, on 28th November 2023

The response given to both requests was this requested report is “commercial in confidence”, and I have since requested a copy of this report with commercially confidential information be redacted.

The concern here is why is this report being withheld from the concerned residents of Wagga by a government owned organisation. If ARTC/Inland Rail (an Australian Government owned business) are withholding information, then we can only assume there is something to hide.

b. Bourke Street Rail Crossing

Within the ARTC EIS, the need for an upgrade of the Bourke Street rail crossing was not considered. However, the additional traffic impact assessment for Wagga was acknowledged in the PIR:

6.1.3.2 Traffic impacts in Wagga Wagga

An additional traffic impact assessment was undertaken in Wagga Wagga using a microsimulation model based on the traffic count data collected and the estimated level crossing closure time during operation. This assessment considers traffic volumes and network performance in 2025 and 2040 in a 'base case' scenario without the effects of Inland Rail, and an 'operational case' scenario in the same years applying Inland Rail train volumes and assumed frequencies.

Assessment

The longer and more frequent level crossing closures at Docker Street and Fernleigh Road would result in extended waiting times at these level crossings and associated traffic impacts at nearby intersections. The predicted impacts are greater in 2040 than 2025 due to the increased growth in background traffic volumes and the additional train services proposed. To allow for an increased proportion of trains of 1,800 m in length during operation of the proposal, a factor was also applied to conservatively allow for an increase in the average closure time at a level crossing.

When compared to their respective base models, average travel times at the Docker Street level crossing will increase at a maximum of 11.5 per cent in the 2025 operational model (in the northbound direction during the morning peak) and 17.8 per cent in the 2040 operation model (in the northbound direction during the afternoon peak). The Fernleigh Road level crossing shows moderate impacts in the operational models when compared to the 2025 and 2040 base models, with the highest increase in travel times occurring in the northbound direction in 2040 by 7 per cent.

The impacts of the longer and more frequent level crossing closures in 2025 and 2040 are limited to some worsening performance of intersections on Docker Street close to the level crossing. These include intersections north of the level crossing: Docker Street / Chaston Street and Docker Street / Brookong Avenue, and south of the level crossing: Bourke Street / Coleman Street, Bourke Street / Athol Street, and Bourke Street / Wooden Street). Table 6-15 and Table 6-16 present the intersections where the delay is predicted to increase by more than 20 per cent in the morning and afternoon peak traffic periods, respectively.

TABLE 6-15 INTERSECTIONS IN WAGGA WAGGA WHERE THE DELAY IS PREDICTED TO INCREASE BY MORE THAN 20 PER CENT DURING THE MORNING PEAK IN 2025 AND 2040

Intersection	2025 base LoS	2025 operation		2040 Base LoS	2040 operation	
		LoS	Delay change (%)		LoS	Delay change (%)
Bourke Street / Coleman Street	C	D	+56	B	D	>100
Docker Street / Meurant Avenue	A	B	+31	B	C	+21
Docker Street / Chaston Street	B	B	+13	B	D	+79
Bourke Street / Athol Street	B	B	+80	C	C	>100
Bourke Street / Wooden Street	B	B	+25	B	B	+17

TABLE 6-16 INTERSECTIONS IN WAGGA WAGGA WHERE THE DELAY IS PREDICTED TO INCREASE BY MORE THAN 20 PER CENT DURING THE AFTERNOON PEAK IN 2025 AND 2040

Intersection	2025 base LoS	2025 operation		2040 Base LoS	2040 operation	
		LoS	Delay change (%)		LoS	Delay change (%)
Bourke Street / Coleman Street	A	A	+9	B	B	+42
Bourke Street / Leavenworth Drive	A	B	+4	B	B	-10
Urana Street / Pearson Street	A	A	+33	B	C	+38
Docker Street / Chaston Street	A	A	+50	A	B	+13

TABLE 6-19 RATINGS FOR COMMUNITY SEVERANCE IMPACTS

Location	Social impact assessment of severance
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Wagga Wagga

The distribution of the infrastructure where residents can meet and interact is almost equal between both sides of the city close to Docker Street level crossing and Fernleigh Road level crossing. Most events take place in the centre of the town, which is located to the north of the railway and potentially leading to the need to cross the railway at Docker Street level crossing for the residents living in the south (noting that there are also other grade and level crossings available to get to the city centre). In addition, the community has already raised concerns about severance.

It is **possible** that increased frequency of the level crossing closures and increased travel time across the level crossings might lead to noticeable inconvenience for the residents living in the southern part close to Docker Street and Fernleigh Road level crossings, resulting in **moderate** magnitude of the impact.

As such, the community severance impact is expected to be **Medium**.

The concerns regarding the extended ongoing interruptions to traffic at the Bourke Street rail crossing have been poorly considered within the PIR. Besides these increased delays acknowledged in the PIR, there is also the factor of human behaviour at level crossings. Whilst it is accepted these trains may be travelling at 80kms/hr, this is not certain due to other impacts on the train speed such as any impacts on speed at the North Wagga Viaduct and rail corner close to The International Hotel, Lake Albert Road. This means the trains may be limited to 50kms/hr which extends the increased delays due to the Bourke Street rail crossing being closed for trains to pass through.

When drivers perceive they could be delayed near railway-crossings with lights and boom gates they often change their driving behaviour. They may speed up and cross the crossing illegally while the lights are flashing, make a U-turn to take an alternative route, or are distracted and lose attention and brake suddenly. Under such conditions, such unsafe practices may result in accidents and danger to others in the immediate vicinity. This, in turn, may result in traffic delays and increased queue lengths. The EIS for the Inland Rail and the PIR both failed to take account of the increased likelihood of further traffic accidents and the subsequent delays when estimating the wait time at level crossings.

Due to the potential, and unpredicted, traffic impact of these longer more frequent Inland Rail trains, the need for grade separation should be considered a priority, yet this was not adequately assessed in this PIR.

Also, with the PIR (Sect 6-23) the report states "It is possible that increased frequency of the level crossings closures resulting in moderate magnitude of the impact", acknowledging that there will be increased travel times across the Bourke Street crossing. As Bourke Street is the most direct route for ambulances to take from the growing southern suburbs to the Wagga Wagga Base Hospital, this increase in travel times, either by waiting at a closed crossing or ambulances having to find an alternate route that may be longer, could impact the recovery of a patient due to the longer trip to the hospital, especially if suffering a stroke or heart attack.

It should also be noted that the modelling of traffic flows at the Bourke Street rail crossing do not allow for an accident on either Docker or Bourke Streets or on the railway crossing. How will an accident impact the traffic flows at this section or the alternate crossings at Pearson Street Bridge, Edmondson Street Bridge and Lake Albert Road?

c. Train numbers/length post 2040:

The PIR acknowledges the following:

Anticipated train numbers remain as reported in the EIS and have not been revised, with 2040 retained as the design year for assessment purposes. It is estimated that the operation of Inland Rail would increase freight train movements up to a total of 18 freight trains per day in the early phase of Inland Rail's operation when all projects are completed, and up to a total of 20 freight trains per day over the following years upon further take up of the service (see Table 1-1 for further information). Train numbers are not expected to immediately increase on completion of construction of the proposal, given the staged delivery of Inland Rail.

TABLE 1-1 BREAKDOWN OF TRAIN NUMBERS BY SECTION OF THE PROPOSAL

Section of the proposal	Train service	Daily train numbers		
		Current	2025	2040
Albury yard to Junee yard	Freight	12	15	18
	Passenger	4 ¹	4 ¹	4 ¹
Junee yard to Illabo	Freight	12²	18²	20²
	Passenger	4	4	4

Note:

1. Melbourne to Albury V/Line services which terminate at Albury yard have not been included. It is assumed there is no growth in passenger services.
2. Bold font represents maximum freight train number in each year.

This extract acknowledges the apparent maximum trains per day for the Albury to Junee section will be 18 freight trains per day (an extra 6 compared to current) and then expected to increase to only 20 trains per day post 2040.

The ARTC EIS refers to train limits of 1.8kms in length with an expectation of up to 18 trains per day, but the concern is that after 2040, the limits placed on the length and frequency of the trains may be voided.

“Detailed analysis of the components of demand resulted in the forecasts of combined north and southbound volumes shown in Table1 and Table 2 following. Demand is shown in Table 1 on a net tonnage basis and in Table 2 on a net tonne-kilometres basis. (The net tonnage carried on a train is the payload only; the gross tonnage of a train includes the weight of the wagons.)” (INLAND RAIL BUSINESS CASE BRIEFING PAPER NO. 2 Pg 3of7):

Table 1 Future freight demand (net tonnes)

		2024-25	2029-30	2039-40	2049-50
NET TONNES (000)					
Intercapital/intermodal	Melbourne to Brisbane	3195	4008	5674	7906
	Brisbane to Adelaide	560	690	997	1412
	Brisbane to Perth	878	1034	1398	1815
Regional	Coal (SEQ-Port of Brisbane)	12 900	19 500	19 500	19 500
	Agricultural products	6750	7129	7954	8873
Total		24 283	32 361	35 523	39 507

Table 2 Future freight demand (net tonne-kilometres)

		2024-25	2029-30	2039-40	2049-50
NET TONNE KILOMETRES (MILLIONS)					
Intercapital/intermodal	Melbourne to Brisbane	5527	6934	9817	13 677
	Brisbane to Adelaide	573	707	1021	1447
	Brisbane to Perth	900	1059	1432	1860
Regional	Coal (SEQ-Port of Brisbane)	3873	6292	6292	6292
	Agricultural products	1687	1782	1988	2218
Total		12 660	16 774	20 550	25 494

The increase in Net Tonnes (000) and Net Tonne Kilometres (000) from 2039-40 to 2049-50 are both 39.3%, acknowledging an increase in demand.

In the Daily Advertiser (28th November 2023) Mr Melvyn Maylin (Inland Rail Director of Program Delivery) stated that “the business case predicts two additional trains per day when the line is completed”. This may be true for 2025, but what about post-2025. Acknowledging the proposed 39.3% increase in demand (post 2040), what is the real number of extra trains post-2040 and post-2050?

The above ARTC tables show that the number of Inland Rail trains either must increase in frequency and/or length to allow for the increase in freight demand – does this mean the ARTC predictions of maximum 20 trains/day and maximum length of 1.8kms are inadequate beyond 2040 (current frequency/size of trains commitments cease 2040). This is concerning in that the EIS and PIR do not detail the approval process required to permit the commencement 3.6km trains and increase in frequency of trains after 2040 or acknowledge how the ARTC/Inland Rail will accommodate this increased demand so as not to negatively impact the city of Wagga Wagga.

d. Alternate Route for Inland Rail around Wagga Wagga CBD:

Failure to properly consider an analysis of an alternative route that bypassed the city of Wagga Wagga. Dr Kerry Schott, in her independent review of the Inland Rail (Recommendation 12) included this paragraph. “In towns, like Wagga Wagga and Gatton, where the route bisects the town [**Wagga Wagga is a city**] no immediate change should be made until there is a clear indication that train traffic is increasing. Modifications to lessen any increased disruption caused by more train traffic should be given very serious consideration and adopted. These changes may include treatment for noise, additional bridge crossings in the town and grade separation. Furthermore, once Inland Rail has been operational for some years (say 10-15 years) there should be a review of its current and expected impacts on the town. If these are significant or are expected to become significant then an alternative route avoiding the town should be planned and corridor easements preserved.” No such corridor has been identified or preserved.

I refer to the “Inland Rail A2I EIS Response” from Wagga Wagga City Council:

1. Synopsis

Despite the city of Wagga Wagga continuing to support the project, a review of the Inland Rail (IR) Albury to Illabo (A2I) *Environmental Impact Statement* (EIS) has revealed several fundamental problems with the accuracy and completeness of the assessment:

1. IR have taken the approach, in their study, to consider only areas of 'enhancement' within the scope of the study. Meaning that only locations where construction works are necessary to allow the passage of double-stacked container trains have been considered. They have not considered the full-length of the existing alignment as impacted as part of the planned rail operations. This contrasts directly with the perspective of Wagga Wagga City Council (WWCC), that the entire A2I corridor must be considered in the EIS process, as it involves the enhanced and modified use of an existing piece of infrastructure.
2. Conflicting positions and views in the alignment of the project scope between the major protagonists, Australian Rail Track Corporation (ARTC), The NSW Department of Planning and Environment (DPE) and Transport for NSW (TfNSW), as well as limited consultation with WWCC on issues of concern, has caused the use of inaccurate data, incorrect conclusions, an incomplete EIS, and a risk to the efficient functioning of the City of Wagga Wagga.
3. There has been limited empirical data gathered for the A2I corridor throughout the assessments. WWCC has gathered data to prove the incompleteness of the EIS. Data related to train speeds and traffic counts is inaccurate, making the conclusions, as to wait times and queueing at level crossings, false and misleading in terms of magnitude and effect.
4. There appears to be little to no consideration toward mitigating future issues identified in the EIS (2025-2040), which are not directly within the scope of IR, these 'pain-points' especially those related to on-grade crossings will certainly occur in the future and are not addressed at all.

5. No alternative routes for A2I have been evaluated, or at least included in this study. One would have expected that these alternatives be mentioned, at the very least.
6. The EIS admits there are challenges in determining the accuracy of qualitative comparisons for impact assessment. Despite this, no empirical studies were undertaken along the A2I corridor.
7. WWCC affirm that the incomplete and inaccurate EIS, combined with the large number of rail interfaces affected by the A2I scope, will result in community severance and that IR will leave the City of Wagga Wagga with a legacy of adverse environmental impacts through the heart of the city.

The conclusion is that the project, in its current form, holds fundamental risks toward the community and City of Wagga Wagga, either not identified, or incorrectly assessed and/or not addressed in this study.

In this extract, Wagga Wagga City Council (WWCC) raised concerns about the EIS and, whilst some of these concerns have been referred to in the PIR, the fundamental concern as to an alternate route being evaluated for Wagga has not been considered, just downplayed.

Also, WWCC, being another level of government, has not been able to access the requested engineer's report for the North Wagga Viaduct and the need for an upgrade to the Bourke Street rail crossing was ignored. These actions by Inland Rail show a lack of respect for both Wagga Wagga City Council and the affected residents of Wagga.

The above omissions highlight major concerns about the impact of the Inland Rail coming through the centre of Wagga. As time goes on, the real impacts will come to reality and will have to be corrected, at a major cost to the taxpayers of Australia. Adding in the cost of infrastructure upgrades required by the PIR, the alternate route around the city of Wagga (not Bomen) could be fiscally responsible in the long term. OR is the ARTC and Inland Rail going to walk away from any impacts created as the project has been finished?

2. Edmondson Street Bridge upgrade:

As part of both the EIS and PIR, the current Edmondson Street Bridge is to be replaced by a new bridge that will be an extra 2.8 metres taller than the existing bridge.

The bridge construction phase is expected to take from 9 months to 15 months (see Table A-9 below):

TABLE A-9 INDICATIVE CONSTRUCTION PROGRAM

Enhancement Sites	Duration (months)	2024				2025				2026			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Wagga Wagga precinct													
Uranquinty Yard clearances	15												
Pearson Street bridge	20												
Cassidy Parade pedestrian bridge	24												
Edmondson Street bridge	14												
Wagga Wagga Station pedestrian bridge	9												
Wagga Wagga Yard clearances	6												
Bomen Yard clearances	6												

The construction of the new bridge will take many months, meaning that all the cars that use this bridge will have to find a detour, these being Lake Albert Road, Bourke Street or Pearson Street. Currently these roads are already busy at the morning and afternoon commute times, and this will only add to this. How is this to be rectified. There is discussion within the PIR that a better traffic signal timing process will commence, however this may fail as there will be an increase in the number of vehicles using these roads and the intersections (acknowledging there are 4 accesses to each set of traffic lights).

When this bridge is completed, it will be 2.8 metres taller than the current bridge and this means:

- The ramp from the Edward Street intersection to the peak of the bridge will be steeper, potentially leading to increased accidents for traffic driving north and coming down a steep decline to the Edward Street intersection. There was discussion about using a different bitumen or other material that could slow traffic down when the roads are slippery, but will this new material be effective for heavy traffic or in heavy storms, when the potential of accidents increases.
- The extra noise from the more frequent, longer, heavier trains will have an impact on the education environment within the 2 surrounding schools.

3. Environmental Impact of Residents:

The PIR acknowledges the following:

- Emissions of sulphur dioxide, benzene and carbon monoxide from the proposal are predicted to result in concentrations well within the assessment criteria during operation. Emissions of particulate matter and nitrogen dioxide are predicted to exceed the air quality criteria at the Wagga Wagga urban case study area and the Culcairn rural case study area. These exceedances are mainly driven by elevated background concentrations, which already exceed or approach the assessment criteria (Operational Air Quality)
- Meteorological conditions are important for determining the direction and rate at which emissions from a source would disperse. Data from weather stations near the proposal were used to characterise the local climate using the most recent long-term datasets (6.3.1.3 Climate and meteorology)
- The air pollutant concentrations were predicted for future operational years of the proposal (2025 and 2040) and the existing operations (2020) were estimated for comparison. Emissions of SO₂, benzene and CO from the proposal are predicted to result in concentrations well within the assessment criteria during operation. Emissions of PM₁₀, PM_{2.5}, NO₂, are predicted to exceed the air quality criteria at the Wagga Wagga urban case study area (6.3.2 Assessment)
- While exceedances are modelled to occur along the rail corridor, the maintenance and operation of trains is the responsibility of the train operators (6.3.2 Assessment)

The above PIR extracts state that emissions of particulate matter are predicted to exceed the air quality criteria at Wagga Wagga urban case study area with exceedance mainly driven by elevated background concentrations which already exceed or approach the assessment criteria. Does that assessment consider the effects of additional emissions due to traffic delays that will be caused by Inland Rail trains?

Also, the comments in Sections 6.3.1.3 rely on assumptions of weather conditions dispersing particulate matter, yet weather changes daily and occasionally there are times that there may be no wind to disperse this matter.

Also, the comment in Section 6.3.2 is concerning in that Inland Rail is “wiping its hands” of any environmental impacts once the project is completed. The requirement of rail operators to replace aging fleet will not be instant, yet the impacts of particulate will be to the surrounding residents.

Summary

The Wagga Residents & Ratepayers Association, along with The Rural Ratepayers Association, have highlighted many major flaws in the Preferred Infrastructure Report from a surrounding residents’ point of view. We have been advocating for a bypass to go around the Wagga CBD, essentially being a new line to head west after the TEYS Abattoir to track alongside the Olympic Highway until the Gobbagombalin Bridge and then track south until rejoining the current rail line at The Kapooka Bridge.

Both associations have been asking Inland Rail/ARTC for:

- The engineers report to attest to the structural integrity of the North Wagga Rail Viaduct
- The total cost of the PIR’s required infrastructure upgrades to the Bomen-Kapooka Bridge section

Both requests have been continually refused despite the contract for the works being awarded to the preferred tenderer.

Both associations are requesting these two requests be complied with, as we believe the cost of a rail bypass could be financially viable considering the costs of the required infrastructure upgrades, future remediation works due to the impacts of Inland Rail coming through Wagga, and the impacts to the health and wellbeing of the residents of Wagga.

I have attached a recommended route for the requested rail bypass, and this recommendation also includes a requested Heavy Vehicle Bypass and a duplication to the Gobbagombalin Bridge.

BUILD THE RAIL BYPASS

Thank You

A handwritten signature in blue ink, appearing to read 'Chris Roche', with a stylized flourish at the end.

Chris Roche – President

Wagga Residents & Ratepayers Association