



Attention: Hon Catherine King MP
Minister for Infrastructure, Transport, Regional Development and Local Government
Email: 'Catherine King MP' Catherine.King.MP@aph.gov.au

I am writing this letter to you in acknowledgement of your recent decision to hold an enquiry into the ARTC Inland Rail project, noting that my letter is referring only to the Wagga section of this project.

The Wagga Residents & Ratepayers Association, along with other residential organisations, request The Australian Rail Track Corporation (ARTC) to divert the intended route of the Inland Rail from going through the Wagga CBD to going around the Wagga CBD, creating a Wagga ARTC Bypass.

The intended route for the Inland Rail is to use the existing railway line from Bomen, through the Wagga CBD, then to the new Kapooka Bridge.

Our suggested route is to connect the Wagga ARTC Bypass to the current railway at or near Bomen's TEYS Abattoir to the north of Wagga, and near the new Kapooka Bridge to the south of Wagga (see "Inland Rail Alternate Route around Wagga CBD" below).

By 2040, ARTC estimates that the trains will be up to 3.6kms long and the number of trains will also increase to over 20 trains a day ([A2I EIS – Chapter 1 Introduction \(nsw.gov.au\)](#)). Currently the trains travelling through Wagga are up to 1.7kms long and up to 12 trains per day.

There are various main reasons for requesting an alternate route:

1. Edmondson Bridge Upgrade:

As part of the construction of the ARTC Inland rail, the current Edmondson Bridge will need to be replaced with a larger bridge that can accommodate the trains having double-stacked shipping containers on them.

The construction of the new bridge will take 9 months, meaning that all cars that use the Edmondson Bridge will have to find a detour, which will lead to an increase in the traffic on the other roads that also cross the railway line. Also in the construction phase, the ARTC Environment Impact Statement (ARTC EIS) acknowledges that "construction at the enhancement site would result in low-to-high impacts at up to 1,758 residential receivers during standard and OOH periods" ([A2I EIS – Chapter 15 Noise and vibration \(nsw.gov.au\)](#) page 26), ensuring there will be loud construction noise during the day and some nights for the residents living near the bridge. This includes the staff and students at South Wagga Public School, Kildare Catholic School and Wagga Wagga High School.

Also, when the new bridge is built, it will be up to **2.8 metres** taller than the current bridge (see

“Edmondson Bridge (with pink high indicator)” picture). This means that:

- The ramp from the Edward Street intersection to the peak of the bridge will be steeper, potentially leading to increase accidents for traffic driving north and coming to a steep stop at the Edward Street intersection
- The pedestrians, mostly school children, will have a steeper walk to and from the bridge
- The extra noise from the more frequent, longer, heavier trains will have an impact on the nearby school’s students

2. Noise & Vibration Effects throughout the Construction Phase and Ongoing Inland Rail Trains:

“When Inland Rail is operational it will have the potential to generate noise for residents in locations including their own homes, schools and in hospitals” (Inland Rail [Managing noise and vibration fact sheet - Inland Rail \(artc.com.au\)](#)). This extra noise may be exacerbated because the number, length and weight of trains will be increasing.

“We acknowledge the operation and maintenance of Inland Rail will have noise impacts for local communities. The draft noise and vibration modelling during construction and operation for areas around the project’s enhancement work sites has been completed” ([Noise and vibration modelling - Inland Rail \(artc.com.au\)](#)).

“The locations where predicted rail noise levels exceed the RING airborne noise criteria consist of: Scots School Albury, seven dwellings in Henty, the Headlie Taylor Header Museum, Yerong Creek Public School, Kildare Catholic College in Wagga Wagga, South Wagga Public School, Junee Baptist Church, Junee North Public School and the Illabo Public School. These exceedances are driven by an increase in daytime LAeq rail noise levels due to increased rail volumes forecast for the day period (7am to 10pm)” ([Technical Paper 7 – Operational noise and vibration \(rail\) \(nsw.gov.au\)](#)).

The concern here is what about the increase in night-time noise due to the increase in the occurrence, weight and length of the trains, noting the existing surrounding noise is reduced in the evening. This will have a detrimental effect on the surrounding residents’ sleeping habits. Also, the effect of the resulting vibrations on the surrounding residents along the rail line will be increased due to the heavier, longer and increased occurrence of the freight trains.

A further concern here is that if there is a breakdown of an Inland Rail train, that will be more frequent, this will lead to major disruption to the current XPT services.

3. Safety Concerns at Bourke St & Fernleigh Road crossing due to an increase in rail traffic, and extended weight and length of the trains:

With the ARTC Inland Rail trains being longer than the current trains and an increase in the number of trains, this will lead to longer and more often wait times whilst the trains are passing through the Bourke & Fernleigh Road crossings. This should be considered considering the city’s main ambulance station is on Fernleigh Road and the main Hospital is on Edward Street, on the opposite sides of the Bourke Street crossing. The question is if an ambulance has to transport a critical patient from the southern suburbs of Wagga (which are growth areas), how will they get

directly to the hospital when a 3.6km long freight train is crossing the Bourke St crossing? These traffic stoppages will negatively affect the flow of traffic from the central Wagga district to the southern suburbs of Wagga (Lloyd, Bourkelands, etc).

From Wagga Wagga City Council’s (WWCC) “Inland Rail A2I EIE Response” submitted to Council’s meeting on 19th September Pg10-11:

“Consideration must be given to the fact that freight trains have been shown to not pass-through Wagga Wagga at the top-speed of 80km/h and are unlikely to do so in the future. Additional delays caused by train stopping/slowing through Wagga Wagga have not been considered in the analysis of on-grade level crossing, this must be rectified...

... The operational impacts on emergency services and consequential impacts on the safety of the inhabitants of Wagga Wagga have not been considered”.

This highlights that the ARTC EIS has not considered the real potential rail crossing closure times that could be up to 4 minutes for a 1.8km train, and then may increase to an 8-minute closure for a 3.6km train. The need to reduce the speed of the trains is necessitated by the speed restrictions on the viaduct. A suggested solution to these concerns is to instal bridges to take the traffic over the railway line but the impact of these new bridges on the surrounding houses will be detrimental.

These extended delays are going to cause extended traffic wait times and force traffic, including emergency services vehicles, to find alternative detours that will go through residents’ roads, creating “rat runs” in these surrounding alternative routes.

WWCC, in their “Inland Rail A2I EIS Response” has also acknowledged the discrepancy of wait times for the traffic wanting to cross the Bourke St & Fernleigh Road crossings (Pg 8):

“WWCC has collected train speeds and gate closure times at the Bourke/Docker crossing to determine the validity of the 121 second claim from IR and have assessed that total closure times are expected to be greater than 121 seconds for a significant portion of rail traffic; the findings are attached in Table 1. WWCC expects and maintains that the frequency and duration of gate closures at all on-grade crossings will increase once IR begins operation.

Table 1. Logged freight train passing variables for Bourke/Docker Intersection.

Train	Closure time (minutes)	Speed (km/h)	length (m)
SCT (Mixed)	4:05	34	970
Pacific National (Intermodal)	2:41	75	1670
Pacific National (Intermodal)	2:32	62	1580
Pacific National (Intermodal)	2:20	69	1517
Pacific National (Intermodal)	2:13	60	1482
SSR (Grain)	1:44	73	953
Qube (Cement)	1:32	61	490
Qube (Cement)	1:15	46	570

”

4. ARTC EIS not refer to post-2040 approval process:

The ARTC EIS refers to train limits of 1.8kms in length with an expectation of up to 20 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 Table 1 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.

The above ARTC tables show that the number of Inland Rail trains either has to 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 does not detail the approval process required to permit the commencement 3.6km trains after 2040.

5. The structural integrity of the current rail viaduct that goes from Bomen to the rail bridge

crossing the Murrumbidgee River:

At a recent meeting of The Wagga Residents & Ratepayers Association, a current Wagga City Councillor (Councillor Rod Kendall, 5th October 2022) has questioned whether this current viaduct can safely handle the weight and frequency of the Inland Rail's proposed trains.

6. WWCC Response to ARTC EIS:

WWCC's "Inland Rail A2I EIS Response" (Pg 18):

"An in-depth and exhaustive study of the A2I EIS, including review and gathering of additional data, has led WWCC to the conclusion that the A2I EIS is incomplete. It does not adequately assess or address the environmental impacts induced by the proposed construction and operation activities of IR. WWCC believes that this situation has been created by the fundamental approach of IR, in their study, to consider only areas of 'enhancement' within the scope of their studies as well as a number of inaccurate general assumptions.

IR have failed to consider the full-length of the existing alignment as impacted as part of IR's planned rail operations. This contrasts directly with the perspective of WWCC, that the entire IR corridor must be considered in the EIS process including cumulative impacts as this project involves the enhanced and modified use of an existing piece of infrastructure for its full length.

There appears to be little consideration to mitigate future (2025-2040) issues identified in the EIS which are not directly within the scope of Inland Rail, these 'pain-points' especially those related to on-grade crossings will occur in the future, nevertheless.

Conflicting positions and views in alignment of the Project scope between the major protagonists, ARTC/IR, DPE and 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.

WWCC eagerly awaits the opportunities and benefits made available by IR and the A2I project but requires that the EIS be made sound and complete by addressing the concerns and issues raised throughout this document. WWCC remains open and available to assist IR in the realisation of this State Significant Infrastructure."

WWCC's Conclusion acknowledges the assumption errors relied upon by ARTC in the EIS, and the W.R.R.A. contends these errors highlight the need for an assessment of an alternate route (bypass) around the city of Wagga Wagga, whilst not jeopardizing the reward potentials of connecting the Inland Rail to the Bomen/RIFL/SAP districts north of Wagga Wagga.

7. Lack of transparent communication with Wagga's Residents:

The residents of Wagga Wagga believe a brochure session (Wagga Wagga City Council, 11th August 2022) and a 1-hour online session (13th September 2022) do not constitute "sufficient" disclosure of the impact of the Inland Rail on the surrounding affected residents. The ARTC representatives could not even answer some specific questions asked at the August session.

There has been a request for a public face-to-face Q&A session with this request declined.

The ARTC Inland Rail Environment Impact Statement acknowledges there needs to be a lot of construction and mitigation works to enable the route to commence through Wagga. I suggest it would be more beneficial financially to consider and develop a bypass, as compared to the impacts of the suggested construction and mitigation works needed for the route to continue through the Wagga CBD centre.

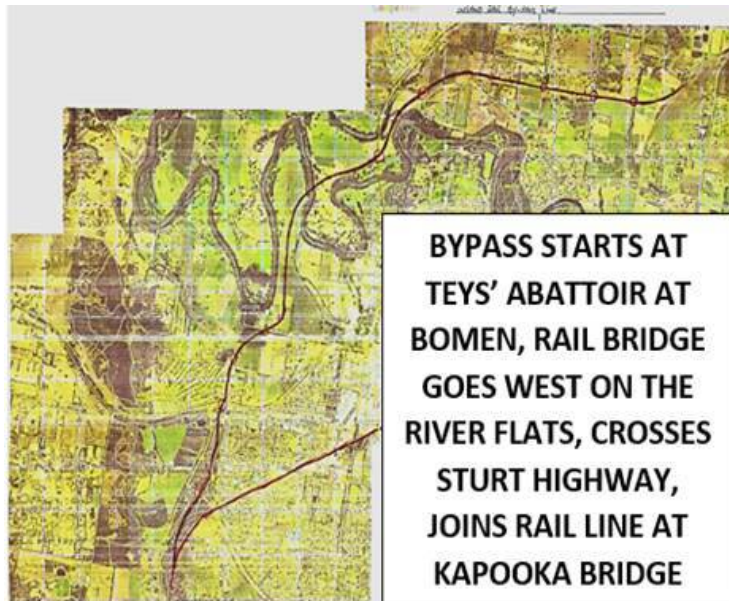
Yet a solution that leads to less disruption to the surrounding affected residents is to amend the rail route to bypass Wagga's CBD District. Whilst there would be an upfront cost of building the bypass over flood plains and crossing major roadways, the long-term impacts on the residents of the Wagga would be greater if the rail was allowed to go through the centre of Wagga. A concerning issue is that an alternate route was never considered by the ARTC directly, or in this EIS, so a valid question is why was no alternate route ever considered, acknowledging if the response is to do with potential cost, how can the ARTC justify cost as a reason when they would not have costed the alternate route? If the ARTC has costed the alternate route, then the W.R.R.A. requested ARTC to disclose this potential cost along with the costs associated with the upgrading of infrastructure along the proposed route as a matter of transparency and disclosure.

The cost of the proposed upgrades to infrastructure will cost \$100M+, yet surely the cost of the proposed bypass, whilst potentially more, will long-term be less when considering the cost of impacts to the residents and businesses within the Wagga centre.

The community is not against the project in its entirety, just it coming through the centre of Wagga. Its link to Bomen, the Wagga Special Activation Precinct and the commercial growth of the Bomen area is fully acknowledged, but as the train will not have a need to stop in the centre of Wagga, why not consider a bypass that goes around the centre of Wagga?

Whilst the Inland Rail will have a large financial boost for the Australian and local community, the potential impacts on the surrounding affected residents need to also be considered and potentially mitigated by utilizing a bypass.

Edmondson Bridge (with pink high indicator) Inland Rail Alternate Route around Wagga CBD



**Thank You,
Chris Roche – President
Wagga Residents & Ratepayers Association
on behalf of The Combined Residents, Ratepayers and Farmers Group of Wagga Wagga**

[Redacted signature]

[Redacted contact information]