

Nathan Stringer - Epping to Thornleigh Third Track SSI5332

From: Nathan Stringer
To: plan_comment@planning.nsw.gov.au
Date: 30/10/2012 1:42 PM
Subject: Epping to Thornleigh Third Track SSI5332
CC: glen.bentley@transport.nsw.gov.au

Sir/Madam,

The Environmental Impact Statement for the Epping to Thornleigh Third Track Project is flawed.

It has failed to address the key community concern of Operational Noise adequately.

1. The high intensity, short duration noise events that are the primary community concern are ignored.
2. As a result the noise model relied upon is unreliable.
3. Given the flawed investigation, the only conclusion that can be drawn is that
 1. High intensity noise events (exceeding 99dBA) will increase at least 140% through the operation of the project.
 2. Residents on the western side of the railway line will experience even greater adverse consequences.
4. No appropriate mitigation measures are proposed.

Further comments are included in the attachment.

The project as currently proposed in the Environmental Impact Assessment will cause major negative effects on the amenity of the Beecroft area.

Excessive noise events exceeding 99dBA will increase by in excess of 140% if the project as currently proposed is approved. This is clearly unacceptable and inconsistent with the government's approach to other projects.

- Proper investigation of the operational noise impacts is required.
- An adequate model needs to be developed.
- Engineered mitigation measures should be determined and included in the model, such that operational noise is managed to acceptable levels.
- These mitigation measures need to be mandated in the determination of the project.

I look forward to you considering these comments in the determination of the approvals of the project.

Regards

Ian Ratcliffe

6 Albert Rd, Beecroft, 2119
m 0407 218 971

The Environmental Impact Statement into the Epping to Thornleigh Third Track is flawed, and ill-considered. Further study of the noise impact during operation of the project is required, and the methods to control the noise impacts need to be determined and modelled. The engineering controls required need to be mandated as part of the assessment and approval process.

The noise generated by trains, particularly freight trains, causes most community concern regarding the project. This is recognised within the assessment. However in the Noise and Vibration Impact assessment noise during operations is given scant regard.

- Some consideration is given to LA10, LAeq, and other statistical measurement. The nature of the freight train movement is such that excessive noise is generated for a few minutes only. The most intrusive noise is generated by diesel locomotives travelling uphill (currently about 10 per day), wheel squeal from poorly maintained rolling stock travelling down hill (again about 10 per day), and rolling stock bunching. Given the short duration of these activities (a few minutes), the cumulative duration of the excessive events is about 20 mins per day. These excessive noise events will only affect the statistic modelling if LA1 is considered. The assessment does not consider LA1. Indeed the duration and nature of the excessive noise events is not presented in the assessment.
- An Operational Noise Model has been established, and is purported to be validated in the assessment in section 4.8 of Noise and Vibration Impact Assessment. At the most significant location, L3, the measured and modelled differ by 5dBA (LAmax). This lack of agreement is disregarded as arising from “high maximum noise events ..of short duration”. This is indeed the case, and should have triggered further study of the noise effects, and development of a reliable model . It was not, and hence the model lacks credibility. The high maximum noise events of short duration are the source of the community concerns. It should be noted that location L3 is near a tight radius (400m) curve, and steep grade. Its exposure is typical of the exposure to noise that occurs between Beecroft and Pennant Hills Stations.
- In Table 11 of Noise and Vibration Impact Assessment, LAmax of 99dBA is recorded with the comment that this arises from “wheel squeal”. This apparently did not trigger further analysis, and in the absence of such further measurement leads to the conclusion that it occurs on many train movements. This concurs with subjective observation.
- The assessment also presents that the freight train movements will increase from the current level of 20 per week day, to 48 per week day in 2026, an increase of 140%.
- In the absence of proper analysis and consideration in the assessment, the only conclusion is the noise events in excess of 99dBA will increase by 140% through the operation of the project. It is indeed likely that the effect will be greater than 99 dBA at residences on the west side of the track, where the noise generation will move closer from the construction of the third track.
- The assessment acknowledges that measures such as LAmax and LAeq do not “provide a complete picture” and recognises that “subjective impacts” should be considered, and suggests that these should be considered when determining feasible mitigation measure. Apparently the authors of the assessment are

suggesting that this be done in the future, after determination of the conditions of the project, and during detail design. This suggestion is not acceptable, and avoids the very purpose of the Environmental Impact Statement. The impacts need to be assessed as part of the Environmental Impact Statement, and required mitigation determined and mandated in the approvals.

- Many mitigation measures are noted in the assessment, however most are rejected, leaving only three as recommended as being “reasonable and feasible”. The three recommended mitigations are:
 - Concreted ballasted bridges – there are no bridges proposed at the steep and low radius sections of the project where the noise impacts are highest.
 - Track lubrication – no evidence of effective implementation of such measures is given. It is unlikely that such measures would be effective on tight curves and steep grades. Effective implementation would require reliable maintenance. There is no evidence that reliable maintenance has, could or would be carried out. There is no evidence provided to suggest that these measures would effect the noise generators – locomotive engine noise, wheel squeal of rolling stock bunching.
 - Building treatment – suggestion of this measure indicates failure of the authors to understand the nature of the community in which the environmental amenity of the area is a key consideration.

The recommended mitigation are inappropriate and inadequate.

The assessment has failed to consider the nature of the noise events that give concern to the community, and properly analyse the effects of the project.
The recommended mitigations are inadequate.

Further study and analysis is required, and appropriate mitigations determined and mandated in the approvals.