# Action for Public Transport (N.S.W.) Inc.

APT NSW

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*Submitted via website*

## Submission on SSI-22004371

## GWH Blackheath to Little Hartley tunnel EIS

**Who we are**

Action for Public Transport (NSW) or "APTNSW" is a transport advocacy group which has been active in Sydney since 1974. We promote the interests of beneficiaries of public transport - passengers and the wider community alike.

**Key points**

- The proposed tunnel, and the road widening east and west of the tunnel, cannot be justified by benefit-cost analysis either separately or together.
- In any event, the proposal is at odds with the State's integrated transport and land use plans and with its intention to transition to net zero emissions by 2050. It is also at odds with the Climate Change Act (Cth) of 2022.
- The objectives for the project have been specified narrowly so that important alternatives were not considered. The alternative of rail freight expansion should be considered.
- Transport for NSW should heed Infrastructure NSW's recommendation that the project be put on hold. Meanwhile, a worthwhile alternative should be sought - possibilities are suggested.

# Discussion

It is noted that the tunnel is one leg of a larger project (expanding the road between Katoomba and Lithgow to 2+2 lanes, necessarily bypassing Victoria Pass which cannot readily be widened). It is a joint project between the state and federal governments. Regrettably, the other legs seem to have run ahead of approving the tunnel even though benefit-cost analyses of these road projects are unfavourable for the three legs either separately or together.

**Climate change**

The attitude of the tunnel's EIS is that climate change is something that affects the design and construction of the tunnel, not vice-versa. A small credit is claimed for the more efficient operation of heavy vehicles that the proposed road tunnel would permit. Unfortunately, there is no calculation in Chapter 23 or Appendix Q of

the extra greenhouse gas emissions arising from more vehicles using the Great Western Highway after major investment between Katoomba and Lithgow. There should be.

**EIS justification of the road tunnels**

Chapter 4 of Future Transport Strategy 2056 dated 2020 wants investigated, among other topics, "continue to work with the freight rail industry to increase volumes of freight on rail ....". In discussing alternatives that were allegedly considered, options of rail freight expansion are dismissed. Ironically, one of the justifications that the EIS claims for the tunnel is that it will permit large road vehicles to carry freight between the Parkes intermodal freight terminal and Sydney. It would be more logical for that freight to go on rail to the St Marys intermodal terminal which is better-placed for distribution around Sydney. The consequent saving in fuel would be reflected in lower greenhouse gas emissions. However, for this to happen modest rail improvements are warranted and should be considered before road expansion.

**Improving the whole rail network**

Operating costs of rail freight are receiving attention all over Australia. Improvements such as longer trains, well-placed passing loops capable of handling long trains, and curve easing have been made on many rail lines. However, much remains to be done. For instance, construction of the Maldon-Dombarton line across the Nepean river and through a new tunnel was stopped by the Greiner government in 1988. That project could be resumed. If the Maldon-Dombarton rail link was available, heavy freight crossing the Blue Mountains and destined for export via Port Kembla could be routed away from the Como bank and carried out of Sydney on the South line. A connection between electric and freight lines could be built somewhere near Warwick Farm, reducing the effect of such freight on passenger services. Benefits of this adjustment would include keeping large freight trains off the Illawarra railway line (easing a constraint on passenger service timetabling) and obviating the extra locomotive power required on the Como bank. If a bypass of the Zig Zag bank was also available, eastbound freight in the Blue Mountains would need less locomotive power, because the 2.5 km Zig Zag climb at 1:42 determines how much power a heavy train must have to cross the Blue Mountains eastward.

**Local rail improvement suggestions for expanding rail freight**

A length of single-track rail tunnel would certainly be much cheaper to construct and operate than twin two-lane ventilated road tunnels bored at 10.5 metre diameter. A single-track rail tunnel could be 6 metres diameter and would result in only about one-third the spoil from the same length of each road tunnel (or one-sixth the spoil from the same length of twin road tunnels). Compare 11 km of twin road tunnel with:

A. An eleventh Zig Zag rail tunnel, single-track, unwired and unventilated, connecting to the north side of the existing railway at Lithgow yard, built underground in a large arc approximately around the Oakey Park area and rejoining the eastbound track at Zig Zag station. It might be about 4km long and graded at about 1:55, which would be considerably easier than the present 1:42.

   or

B. A southern bypass of the Zig Zag bank and tunnels. It could start in Lithgow yard, go under Chifley Road and Evelyn St and turn towards Bell station. It would be about 11 km long, similar to the proposed road tunnels. Most of it would be in tunnel. At its eastern end it would pass under Chifley Road at Bell and join the existing tracks. It would be graded at about 1:70 and would take only about 10 minutes to traverse, saving at least 10 minutes compared to the existing railway (and more for slow trains).

There would be many other possibilities. They should be explored before the present EIS is determined.

# Conclusion

As noted, the road tunnel project is not warranted. Even if it was warranted, it would not be appropriate in the State's present situation. However, rail improvements are available which would tend to increase the use of rail freight, bringing consequent benefits in emissions and safety.

# Recommendations

For the reasons set out above, the road tunnel project should not proceed. Meanwhile, freight rail improvements should be investigated and brought to the "shovel-ready" stage.

Jim Donovan
Secretary
Action for Public Transport (NSW) Inc.