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23 November 2012

Director-Infrastructure Projects
North West Rail Link EIS 2: Application number SSI-5414
Major Projects Assessment,
NSW Department of Planning and Infrastructure
GPO Box 39
Sydney, NSW, 2001

Dear Sir/Madam,

Please find attached my submission in response to the Second Environmental Impact Statement (EIS 2) for the North West Rail Link (NWRL) Project (application number SSI-5414).

Upon reading the NWRL EIS 2, I have identified a number of important operational issues that have been completely overlooked in the NWRL EIS 1 and EIS 2. These issues will have ongoing negative impacts on thousands of commuters who travel on the Epping to Chatswood Line and Northern Lines each day. I also provide a simple, cost-effective and practical suggestion for how the current NWRL proposal could be modified to alleviate the problems that I have identified in this submission (see page 5 of this submission).

In its current form, I am therefore unable to support the NWRL proposal, however, with some simple changes to the NWRL proposal, as outlined below, I believe this important project could proceed with significantly better outcomes for commuters across wider Sydney, and especially for the thousands of people who use the Epping to Chatswood and Northern Railway Lines, now and well into the future.

Please see the following pages for a summary of the issues of concern and ways in which the NWRL proposal can be modified to alleviate these problems. I request that you withhold all personal information (including my name and address) identified in this letter from dissemination to the proponent, Department's website, or any other entity, according to the provisions stated on page 98 of the North West Rail Link Environmental Impact Statement 2- Overview. Any details regarding the nature of the issues identified and proposed solutions may be made freely available.

Yours faithfully,
[REDACTED]

Each issue is addressed in point-form below.

Operational impacts of the North West Rail Link Proposal

1. Fragmentation of train services operating on the Epping to Chatswood (Macquarie Park) and Northern Rail Lines

The current NWRL proposal will see the conversion of the existing Epping to Chatswood line from an integrated railway line that accommodates two-story trains to that which can only accommodate the single-level trains running from Epping to Cudgegong Road and is isolated from the rest of the CityRail network. These new single-level trains will terminate at Chatswood, forcing all commuters continuing on past Chatswood to change trains. The EIS 2 is supposed to assess the operational impacts of the NWRL, which will have direct and major impacts on the Northern Railway Line and Epping to Chatswood Railway Line.

The current NWRL proposal will have a profound impact on the daily transit of current and future users of the Northern and Epping to Chatswood Railway Lines. Northern Line trains from Hornsby will no longer travel to the city via Macquarie Park and all trains travelling East along the Epping to Chatswood Line will terminate at Chatswood, forcing commuters to change trains once or twice along trips that currently require no train changes. These drastic changes to the existing operations of the CityRail network are barely given a mention in the EIS, let alone adequately assessed. Since the opening of the Epping to Chatswood Railway Line, it has provided a vital, rapid and direct public transport route for commuters accessing Macquarie University, Macquarie Park, North Ryde, Chatswood, North Sydney, St Leonards, Artarmon and other lower North Shore from stations along the Northern Line including; Normanhurst, Thornleigh, Pennant Hills, Beecroft, Cheltenham and Epping. It has also given commuters travelling from the 7x Northern Line railway stations between Epping and Strathfield rapid access to the lower North Shore stations with only one transition at Epping required.

However, under the proposed NWRL, those poor commuters who need to access the business hubs of North Sydney, St Leonards and Artarmon from stations between Normanhurst and North Strathfield (a total of 13 train stations) will now be forced to make two train changes (ie. A total of 3 trains per journey) in order to get to and from their workplaces, only 30km away- with changes at both Epping and Chatswood required. For those commuters originating from between Normanhurst and Cheltenham, this will result in what is currently a single train journey to now a trip that involves two train changes (ie: three trains!!!) in each direction- that is six trains per day for a journey only 30km each way!!!

It is identified in EIS 2 that a key objective of the NWRL is:

“...convenient access, integration and interchange with other transport modes as part of the broader strategy to provide an integrated transport network for Sydney (page 6-22)”.

Isolating the Epping to Chatswood Railway Line from the rest of the CityRail network, is in direct conflict with the above objective, as it will fragment this Line and the daily journey of thousands of commuters who currently use the Epping to Chatswood and Northern Lines. It should also be noted that the proposed changes will also have implications for all businesses and educational institutions currently located along the Epping to Chatswood Line. This includes Macquarie University, Macquarie Shopping Centre and the technology hubs of Macquarie Park and North Ryde. The current NWRL proposal will mean that almost all commuters (except those on the North West Line) will be forced to change trains at least once (at either Chatswood and/or Epping) in order to get to stations between Chatswood and Epping. This includes the large number of people that commute between the city and Epping-Chatswood Line Stations, who currently enjoy a single train journey to and from work/university. It also should not be forgotten that a significant proportion of those who use the Epping to Chatswood Line live locally, between Normanhurst and Cheltenham. By forcing them to change trains at Epping, we are bound to see more people choose to take their cars to work instead of public transport, as it simply isn't worth the time and hassle (not to mention expense) of catching two trains each way, when the total distance they need to go is less than 10km. The EIS 2 claims:

“The North West Rail Link will not generate traffic in its own right. (page 63- North West Rail Link Environmental Impact Statement 2- Overview).”

However, one must question whether such studies have considered the operational impacts of rail route changes due to the NWRL on traffic in broader Northern Sydney. It is highly likely that with the consequential changes to the operation of the Northern and Epping to Chatswood Lines, more people living along these railway lines will choose to use their cars when travelling to Macquarie Park, Macquarie University, Chatswood, North Sydney, St Leonards and other lower North Shore stations, as having to change trains once or twice per journey is too inconvenient and time-consuming.

2. Integration between NWRL and Northern Lines and rail service frequency

While the EIS 2 focuses on a cross-platform transition between trains at Chatswood and connecting services “expected” every 3 minutes during peak periods at Chatswood, there are no assurances or commitments made for integrating the NWRL with services to/from Epping and outside peak times. The EIS 2 states that the NWRL will have a “customer focus” and:

“Transfer through the interchanges and between modes should be seamless and within a minimum time (page 6-3).”

Commuters who have to transition between Northern Line and NWRL services at Epping will be forced to move from above-ground to below ground platforms and are given no assurances in the EIS that Northern Line services will be timetabled to minimise the wait between connecting train services at Epping. This is particularly important during non-peak and weekend periods, when trains will operate less frequently along both the NWRL and the Northern Lines, resulting in potentially very long wait times.

In addition to changes in the route of trains running along the Northern Line, the NWRL will potentially result in changes in the frequency of trains stopping at Normanhurst, Thornleigh, Pennant

Hills, Beecroft and Cheltenham. The EIS 2 fails to specify the impacts of the NWRL on the frequency of Northern Line services, other than stating:

“Frequent rail services to the city via Strathfield would be provided during peak times with regular services during the off peak period. (page 6-77)”

Such a vague statement does not give commuters who use the Northern Line any real indication of how service frequency will be impacted. Currently, all-stations train services running between Hornsby and Epping operate every 15 minutes at both peak and non-peak times and on weekends. **It is vital to users of the Northern Line to maintain the frequency of all-stations train services to once every 15 minutes at both peak and non-peak times on weekdays and weekends following opening of the NWRL. Train services on the Northern Line need to be coordinated to minimise waiting periods for transfers to NWRL services during both peak and non-peak periods on weekends and weekdays.**

3. *Community Consultation*

An entire chapter in EIS 2 (Chapter 5) is devoted to the community consultation processes which have been undertaken as a part of the NWRL proposal and indeed a key objective of the NWRL project is to:

“Deliver a transport service that has been informed by engagement with communities and stakeholders and demonstrates evidence based decision making (page 8- North West Rail Link Environmental Impact Statement 2- Overview).”

Despite this objective and the 20 page chapter on consultation, the EIS does not once describe any community information or consultation efforts undertaken targeting affected communities along the Epping to Chatswood Line or Northern Line. Since the NWRL will have direct impacts on how commuters along the Epping to Chatswood Line and Northern Line use public transport, there should be a conscious effort to educate residents in these areas about the impacts of the NWRL and to seek their feedback and ideas regarding the NWRL proposal. This has not yet taken place and many people who currently use these railway lines on a daily basis are unaware of the major changes that will take place to their commute as a consequence of the NWRL. The EIS 2 also fails to discuss the cost to commuters of using the NWRL, which will operate as a private railway line. Of particular concern is the possibility of increased fares along the Epping to Chatswood Line (an already fully-paid for public Railway Line) as a consequence of its conversion from a public to a private railway line. The EIS 2 does not address any concerns about the cost to commuters of using a privatised Epping to Chatswood line.

Before the NWRL proposal can proceed any further, commuters who currently use the Epping to Chatswood and Northern Lines (which will be effected by the NWRL) must be actively consulted regarding the proposed operational changes caused by the NWRL. The public need to be assured that privatisation of the Epping to Chatswood Line will not result in increased fares now or well into the future.

THE SOLUTION: A better North West Rail Link Proposal- Terminate North West Rail Link trains at Epping, not Chatswood

As outlined above, there will be many negative impacts of the current NWRL proposal on people living in or needing to travel to Northern Sydney suburbs. However, one simple change to the proposal will both lessen the negative impacts of the NWRL on the broader community AND reduce the cost of building the NWRL. **By simply terminating services from the NWRL at Epping, rather than Chatswood, it would mean a maximum of only one train change would be required for all commuters- whether they use the Northern Line or NWRL; and residents along the Epping to Chatswood Line would not be forced to change trains at all.** Commuters along the North-West Line would then be able to transfer to the current (and additional) services running from Hornsby to the City via Macquarie Park at Epping, rather than at Chatswood. This would alleviate the mass congestion problems forecast at Chatswood station as a result of the current NWRL proposal. The biggest benefit would be that no one along the Northern Line stations would need to change trains at both Epping and Chatswood in order to get to the main lower North Shore stations, (either no changes would be required or only one at Epping, as is currently the case). Also, commuters travelling from the city to stations along the Epping to Chatswood Line would not need to change trains either (just as they currently are not required to), providing the best link possible between the CBD and technology hub around Macquarie Park/North Ryde and Macquarie University. Terminating NWRL trains at Epping is a viable alternative to Chatswood, as the current NWRL proposal includes provision for a crossover cavern to allow trains to cross from one track to another at Epping (page 12- North West Rail Link Environmental Impact Statement 2- Overview).

What Sydney needs is an integrated public transport system that promotes its use by minimising the inconvenience and cost of using the rail network to commuters. Fragmenting and privatising the heavily used Epping to Chatswood Line from the rest of the CityRail network will not help the State government achieve its public transport goals. It will also counter efforts to create a “city of cities”, which requires fast and direct transport from across the metropolitan area to major centres outside of the CBD, including Chatswood and Macquarie Park/North Ryde. While the long term goal may be to extend a single-storey rapid rail transport network to Sydney CBD and Southern Sydney (page 6-2, EIS 2), the reality is that any such implementation is many decades away. Until a second Harbour Bridge rail crossing can be financed and built (which is not expected to happen for decades), the Epping to Chatswood Line should remain integrated with the Northern and North Shore Lines, to promote a rapid and simple public transport system for the maximum number of commuters travelling to and from Northern Sydney. The NWRL is an important infrastructure project that is needed to help Sydney grow. However, it is essential that the NWRL be designed and implemented with the wider Northern Sydney community in mind, rather than simply follow a political agenda without addressing the broader impacts.