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Wednesday, 28 November 2012

Director, Infrastructure Projects Dept. of Planning and Infrastructure GPO Box 39 SYDNEY NSW 2001

By Email

Dear Sir/Madam,

Attention: Director, Infrastructure Projects - North West Rail Line - EIS 2 (SSI-5414)

I write with reference to the opportunity to provide comment on the second Environmental Impact Statement relating to the construction of the North West Rail line – application no. SSI-5414.

Busways supports the proposals contained within the EIS documentation relating to the station designs, railway operating systems and project operations associated with the anticipated North West Rail line.

In doing so it is acknowledged that the delivery of this significant piece of public transport infrastructure is an important plank in the overall provision of public transport to the north-west area of Sydney.

Notwithstanding this support, there are a number of issues relating to the management of the current bus route network that are potentially problematical and warrant further investigation. These are documented in the remainder of this submission.

The EIS, while addressing the broader scope of works, identifies and reinforces the prime roles of both Castle Hill and Rouse Hill Town Centre as major hubs for the regional bus network, and therefore my comments relate largely to these two centres.

Castle Hill Interchange

The high demand for bus layover is referred to within numerous sections of the EIS. Further, it has been correctly identified that currently layover occurs on the south-eastern side of Castle Hill Rd - in the *immediate* vicinity of the departure ranks, which are directly opposite. (EIS 2 – Overview pg. 62)

It is the strong co-location of bus layover space and arrival/departure ranks that facilitates efficient bus operations within this busy bus hub.

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It is however, asserted that bus layover in Castle Hill is for periods of *"15 minutes up to an hour"* (EIS 2 – Operation Traffic and Transport Management Plan pg. 75). This is partially inaccurate and therefore erroneously used to support the provision of a remote layover location post construction.

Short term layover is considered to be anything above 5 minutes in duration (and is often simply a slightly extended break between two trips). It allows the bus driver the opportunity to access toilets in between trips, especially during longer sections of the allocated driving shift.

While the accompanying assertion that "...these breaks are best taken away from any passenger pick up/set down areas..." is correct, it is not feasible to access a remote layover for most toilet-break opportunities.

With all this in mind, and given the high volume of bus movements, even short term layover within the interchange may be an insurmountable stumbling block, and therefore a twin-pronged approach is required, i.e. *during* construction, and *post* construction.

During construction the proposal to continue to utilise Old Castle Hill Rd for both short and long term layover is acceptable, and the current long-standing local practices can continue.

Post construction however, it would be profitable to return to an earlier proposal to retain some bus ranks in Old Castle Hill Rd...this was the subject of former studies on a proposed bus interchange in Castle Hill.

I have taken the artist's impression (below) of the precinct from the EIS documentation to illustrate this point.

This proposal allows for the separation of bus services operated by Busways, which, while providing some local feeder services to the community, are for the most part, *cross-regional* in nature.

Importantly, and in addition to affording increased predictability for public transport users, this



Additional Bus Ranks – Old Castle Hill Rd

proposal also allows for a small amount of short term layover within both Old Northern Rd and Old Castle Hill Rd.

Given the intention to provide a **long term** bus layover facility "...remotely away from the bus interchange" (EIS 2 - Traffic and Transport Management pg. 69), it is critical that adequate space for appropriately located **short term** layover is planned for now, and that this does not hinder the operation of this busy interchange.

Further, it is equally imperative that a dedicated toilet is provided for bus drivers somewhere in this immediate vicinity. (It is noteworthy that a facility of this type located in Arthur Whitling Park serves this purpose for buses on short term layover in both Old Castle Hill Rd *and* Old Northern Rd).

The ranking arrangement that I have proposed in Old Castle Hill Rd also allows Busways bus services, owing to their origin/destination, a short, predictable and efficient route from and to Showground Rd via: <L> Pennant St, <R> Old Castle Hill Rd, <RANK>, <R> Castle St, and <L> Pennant St.

The report (EIS 2 – Construction Traffic Management pg. 39) also noted that the performance of the signalised intersection of Old Castle Hill Rd/Pennant St/McMullen Ave is expected to deteriorate and bottom out at LoS F. Given the huge number of buses exiting Old Castle Hill Rd via this intersection, consideration must be given to diverting construction traffic away during the morning and afternoon peaks.

In the worst case scenario, queuing from this intersection could extend back along Old Castle Hill Rd beyond Eric Felton St, and hence impact on the bus interchange.

Given that large numbers of school students are moved in and out of Old Castle Hill Rd by bus, unacceptable delays could well impact on the timeliness of school student transport.

Rouse Hill Town Centre Interchange (RHTC)

In view of the concentration of bus services at RHTC, and the intention to provide bus layover remote from the operational bus ranks, as at Castle Hill, (EIS 2 - Traffic and Transport pg. 9-37), an identical set of circumstances relating to short term layover also exists at this location.

Hence, all of the abovementioned comments relating to the proximity of short term layover parking to the operational bus ranks (and the provision of bus driver's toilet facilities), are also valid in this instance.

What *is* different at RHTC, is that this problem exists in both the temporary arrangements (during construction), *and* the permanent arrangements (post construction)...whereas it only exists post construction at Castle Hill – if the proposal for bus ranks in Old Castle Hill Rd is adopted.

As iterated previously, it is imperative in circumstances where long term/meal break layover space is remote from the operational bus ranks, that separate short term layover parking and dedicated toilet facilities are provided in the immediate vicinity of the operational bus ranks.

Should the northern layover area be the site of the *only* toilet facilities provided, then the circuitous route to and from this site will guarantee the late running of buses where bus drivers require access to toilets during most short term layover.

The provision of a bus driver's meal facility is not mentioned in the section relating to layover during construction (EIS 2 – Construction Traffic Management pg. 72). This, too, is imperative and must be included in the scope of works - particularly as the bus drivers currently enjoy such a facility at RHTC.

It is noted in section **4.10.3 Heavy Vehicle Routes** (EIS 2 – Construction Traffic Management pg. 69) that entry into RHTC from the north is proposed to be via a left turn into White Hart Dr from Windsor Rd, followed immediately by another left turn into the construction access road.

Given the opposing movement of buses on the construction access road at that location, consideration should be given to modifying the kerb-returns of the inner radius of the turn to safely accommodate the turning paths of heavy vehicles.

Bus Routes during Construction at RHTC

The EIS documentation indicates temporary bus routes during the construction phase of the station at RHTC – (EIS 2 Construction Traffic Management pg. 71ff)...these have been thoroughly investigated and are considered to be inappropriate and inefficient.

This determination was reached by a joint working group whose members comprised representatives of TfNSW, NWRL, Busways and Hillsbus.

This process entailed not only determining recommended temporary bus routes, but also the bus ranking arrangements in Tempus St and the construction area access road.

Universal agreement was reached by all members of the working group that their proposal would satisfy the needs of all interested organisations.

I have produced a detailed plan depicting the results of the agreement on temporary bus routes and ranks, and appended it at the end of this letter. (*NB. This plan shows only Busways bus routes, but also accounts for the routes operated by Hillsbus – as per the agreement of the working group).*

A critical component of this, and hence worthy of independent mention, is that a right hand turn for buses from the T-way (northbound) to White Hart Dr (eastbound) will be required. As such, this must be modelled and incorporated into the enabling works for the construction at RHTC.

Cudgegong Rd Interchange

It is noted that the design for this interchange sees buses allocated rank space on both sides of the *northern* spine road. (EIS 2 - Operation Traffic and Transport Management Plan pg. 149).

The utilisation of the northern spine road introduces inefficiency into bus operations in this precinct. This is owing to the fact that this road does not connect full-length between Cudgegong Rd and Tallawong Rd. Rather, two additional turning movements are required to complete this leg of the bus route servicing this station.

Therefore, given that the station has direct pedestrian access to both the northern *and* southern spine roads, consideration should be given to providing bus ranks on both sides of the *southern* spine road in the vicinity of the station access point.

Since the southern spine road is planned to directly connect Cudgegong Rd and Tallawong Rd, it would be odd to ignore it as the logical choice for bus routes through the station precinct, which could then operate in a simplified and hence more efficient manner.

Intermediate NWRL Stations

It is reasonably asserted that the delivery of the NWRL will signal the end of many of the M2 city express bus services (EIS 2 – Operation Traffic and Transport Management Plan pg. 35).

It is further mentioned that "These buses would then be used more efficiently to provide enhanced feeder services into NWRL stations..."

While it is anticipated that some of these 'feeder services' would also continue to a major hub such as Castle Hill or Rouse Hill, it is also envisaged that many services would simply operate a shuttle service to and from adjacent residential areas to the nearest NWRL station.

Given that this style of operation would most likely occur for extended periods during morning and afternoon peak times, consideration should be given to providing a dedicated bus driver toilet room at each NWRL station.

While this may seem excessive upon first consideration, the provision of such facilities from day one would ensure the easy maximisation of bus-scheduling potential, and the delivery of an agreeable working environment for current and future bus drivers.

In conclusion, Busways appreciates the opportunity to comment on this second EIS relating to the NWRL, and also the invitation to participate in the Traffic and Transport Liaison Group.

Should any clarification or further comment be required, I can be contacted on 0438 537 977 or at <u>Dave.Davies@busways.com.au</u>.

Yours Sincerely BUSWAYS Group

Dave Jamis

Dave Davies Planning and Infrastructure Manager



Rouse Hill Town Centre – Temporary Bus Rank Arrangements and Busways Bus Routes