

## Diane Sarkies - NWRL EIS2 comment

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### Major Projects Assessments Team North West Rail Line

While I support the NWRL proposal I strongly object to the EIS on the following issues.

#### **Proposed temporary access road near Cheltenham Oval.**

It is my understanding that the proposed permanent access road through high quality bushland to the Cheltenham Service Facility, as described in the EIS1, will now be a temporary road to be used during the construction and after the completion of the project it will be removed and the bushland reinstated and regenerated. **This proposed temporary road is fully supported. But it should also be regarded as a significant change in the scope of the works as outlined in the EIS1 because the road is now temporary and the assessment of the best location for subsequent regeneration of significant bushland was not addressed in EIS1.**

TforNSW was created to improve co operation and co ordination between various transport agencies. The logical and optimum access solution is to use the M2. This would involve various transport agencies working together to achieve such a solution. Feedback to date is that there is little guarantee that this can be achieved. Reasons given centre around road safety. This is difficult to believe as access onto the M2 was made to work for the Epping to Chatswood Rail Tunnel at Delhi Rd.

Instead an access road is likely to be constructed through the adjoining bushland to Kirkham St. I met the NWRL Place Manager together with an NWRL engineer and town planner on site at Cheltenham Oval on Thursday 29<sup>th</sup> November and we discussed the best location for a temporary access road and how the disturbed ground could be regenerated back to bushland after the road is removed. I was told the regeneration process was the main reason for the meeting to which the planner emphasised that the proposed location of the road adjacent to the M2 boundary is approved already as part of the EIS1. The planner further stated that the chances of having the road location reassessed was highly unlikely because the EIS1 stage is now completed with a likely time delay of 3-4 months to revisit new approvals would be difficult.

What everyone appears to miss is that the original scope for a permanent road has been changed to a temporary road. This means that NOW Hornsby Council will be handed back an area of disturbed land that will require long term maintenance (30 years minimum and not just 2-3 years) for it to fully recover and become an integral part of the bushland again.

However the topography adjoining the M2 is the most rugged in the whole bushland reserve. There are significant rock formations in this area with cross falls of over 5 metres. There would have to be major batters, gullies filled in and rises removed. The amount of cut and fill will be significant. The access road will destroy this bushland environment to the extent that it will be **impossible to reinstate the original bushland** with its minor gullies and major rock formations. **What has been approved may be satisfactory for a permanent road but is the WORST position to construct a temporary access road.** And of course the EIS1 did not assess the concept for a temporary but only for a permanent road. So clearly the EIS1 process must be revisited in order to satisfy the objectives of the EPAAct and matters under sec79c. Otherwise there is no valid approval for a temporary access road.

Earlier in the month the public were verbally informed by NWRL that the project was seriously considering building the access road with reduced width along the existing walking track that traverses the bushland from Kirkham St to the oval. The existing walking track is shorter in length then the proposed route along

the M2 fenceline, and follows a uniform grade with minimal cross slope. So with careful design it would cause minimal damage to the bushland and the regeneration in the vicinity of the walking track would be easier and achieve better success than following the M2 boundary. The public were also informed that with only 70 truck movements over 10 hours the access road would not need to be 2 lanes for the total length. These comments were considered to be positive and a good solution.

However at the onsite meeting on 29<sup>th</sup> November the engineer and planner stated that 2 lanes will be required for the full length of the access road, the amount of disturbance to the bush land would be the same wherever the road is built, it will be very difficult to revisit the EIS1 as the walking track option is outside the approved area, it will take additional 3-4 months to reassess and get approvals changed ( including the Commonwealth approval for the STIF) and the impact on the STIF vegetation community will be greater if the walking track location is chosen. All these assertions were challenged that day onsite and the NWRL simply were not prepared to enter into serious discussion on the issues.

I am also aware that Council initially supported the option for a permanent road along the M2 fenceline. But this was based on 2 factors that are now quite irrelevant. The first factor was that it would be best to have a permanent road on the edge of the bushland. This is accepted and is common sense. And the second is that the bushland along the fenceline is in Roads and Maritime Services (RMS) ownership. So the permanent road would have been in RMS ownership and this makes common sense also. But now with a temporary road the long term manager of the RMS land will default to Council, as is occurring now. This steep area along the fence line will be impossible to reinstate as it is today and it would be a difficult site to regenerate. RMS are unlikely to engage bush regenerators to maintain this bushland. The weeding will default to council as they weed the adjoining bushland. In other words if the access is built along the fence line on RMS land and then removed and the land regenerated, it will be council who will be doing the bush regeneration into the future not RMS. Bush regeneration has no definite time frame but is an indefinite activity because birds and wind are always dropping seeds. Also we can expect that in the future RMS will end up gazetting this bushland strip as public reserve placing it under council's care control and management.

This of course leads into another legal and planning issue. Is RMS, as the owner of this land and being another government agency, aware of what is now proposed? Are RMS aware that the road will now be temporary and their bushland has to be reinstated and bush regenerated? As outlined above, Council must be included in any RMS discussions as council will end up inheriting the care of this land along the fence line.

The planning issue is the definition of what activity is now being assessed. The current approval is for a road. Now that a temporary road is proposed then the final activity that should be assessed is reinstatement and regeneration of the bushland under sec 79c of the EPAAct. And the best location for regeneration could well be completely different than it is for a permanent road.

In summary the main issues are,

1. It is very easy to prove that the degree of disturbance along the walking track will be significantly less compared to the proposed access road along the M2 boundary
2. It will be easier and better environmentally to regenerate in the vicinity of the walking track as the land is flatter with an even grade and has deeper soils.
3. It is difficult to agree with the engineer that 2 lanes are essential for this lightly used temporary access road.
4. The amount of STIF that is affected by a road along the walking track could be significantly less than the impact of a road along the M2 fence line.
5. The environmental reports in the EIS1 did not address reinstatement and regeneration of the bushland because it was outside of the scope.
6. It is difficult to see how time delays should be treated as important when this minor facility would not be on any critical time line.
7. And most importantly EIS1 only assessed a permanent road and not what is now proposed which is bush regeneration after the removal of a temporary road. It is clearly a different activity.
8. I can't see how Hornsby Council and also the public, would prefer to inherit a highly modified area

of regenerated bushland along the M2 fence line compared to a smaller area that would be easier to regenerate along the walking track.

9. RMS must be consulted as the owner of the land along the M2 fence line. Also council should be a signatory to any long term agreement as they are likely to inherit its long term care.
10. Also the work at Cheltenham should be delayed till the total funding is available and approved, otherwise we may end up with a 'white elephant'
11. Any work at Cheltenham should be delayed till the train tunnels are bored so the service facility will be located in the optimum position.

Clearly the approval **for a permanent access road along the M2 fence line is now inappropriate and therefore invalid** . With the change in scope from a permanent to a temporary access road a new assessment will required. There is no alternative. Even the environmental reports are now inadequate because they would not have addressed the new activity, that being reinstatement of bushland and its regeneration.

### **Proposed Metro.**

While the concept is addressed in a separate government strategy paper, I believe the way it is being delivered is flawed from a long term efficiency view point. If a metro line is built it must be able to be fully integrated into the existing network. If not then the network in 30-50 years may not have the necessary flexibility to adapt to the Sydney's long term transport needs. This means the NWRL tunnels should be large enough to allow for the existing heavy rail. While the metro may be a push to privatise the rail network, having an independent parallel network that cannot be integrated will fail to provide the long term efficiencies Sydney needs and is therefore short sighted. If there is a push in 20-30 years time to privatise the existing network then having the flexibility to incorporate any metro line would surely be an advantage. What is proposed will not allow that to occur. Therefore the EIS appears to not to deliver what the government's long term needs should be.

### **The idea of a Metro system**

A metro system works well over short distances with high passenger use. The Sydney network has long distances and not the degree of high density living that other major cities have. Passengers in Sydney do not want to stand for over 30 minutes on a train. Also the metro will not be any quicker than the existing trains because it has to eventually link into the existing train timetable. So while it may be fast over limited sections the commuter is unlikely to receive any material benefit. The proposed metro appears to be a push from private enterprise. Private enterprise has a single focus and that is to make a profit. The mission statement in the EIS is customer focus. The best system for the customer is the existing heavy rail network because it is integrated and has the seating capacity needed. So the EIS fails to satisfy the government's mission statement .

### **The existing Northern Line.**

The EIS appears to be silent on the future operation of the existing line between Epping and Hornsby (stations Cheltenham to Normanhurst). I can assume the trains coming up through Strathfield and Eastwood will continue above ground through Epping to Hornsby. I can't comment on assumptions. Therefore the EIS should have explained how this existing Northern Line will work. So there are questions unanswered by this EIS.

How will the existing Northern Line work?

What frequency will be the service?

The EIS has a mission statement focused on customer service but what is proposed appears to fail in delivery for the Northern line.

### **The bigger picture**

While there is a push to get the NWRL up and running, and this is supported, the larger strategic picture should also have a priority. The metro is designed to be a parallel network to the existing network extending through the CBD and into the southern and western suburbs. In theory this appears efficient on paper but in

50 years what will we have? As stated above any metro system must be able to be integrated into the existing network. Also while the NWRL has a high priority ( should have been built 10 years ago) the extra capacity through the CBD and over the Bridge is an integral part of that priority. It begs the question, why have a metro at all? Unless there is scope for integration the whole network should be heavy rail with no Metro.

### **Metro to Chatswood**

The proposal to extend the metro to Chatswood EIS is one option. Other options have not been assessed in the EIS.

A good example would be to have alternate NWRL trains AND Northern Line trains proceeding to Chatswood or as occurs now, into the city. Why have trains running every 5 minutes coming down the Northern Suburbs line? This is very inefficient use to rolling stock on the line through Gordon to Hornsby. For this option to work heavy rail may be required on the NWRL of course. But this option achieves the EIS's objectives better than the current proposal.

Alternatively why can't the metro terminate at Epping and the existing network continue as is. Additional underground platforms could be constructed at Epping to cater for the terminating NWRL trains. Perhaps these options have been considered, to a degree, and dismissed without full assessment. If so the EIS is deficient in its assessment process.

Therefore from reading the EIS the Metro is locked in and not negotiable. So the EIS is deficient in assessing various options, thus failing to satisfy statutory objectives under the EPAAct.

Regards Ross Walker , Beecroft.  
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