



**BEECROFT – CHELTENHAM  
CIVIC TRUST**  
I N C O R P O R A T E D

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**SUBMISSION**

by



**BEECROFT-CHELTENHAM CIVIC TRUST**

on the

**North West Rail Link Project**

**Environmental Impact Statement No 2**

**Application no SSI-5414**

Department of Planning  
Received  
3 DEC 2012

Scanning Room

The Beecroft-Cheltenham Civic Trust ("the Trust") **objects** to elements of the work described in this Environmental Impact Statement ("EIS") for the following reasons:

**1. Cheltenham Services Facility – Local Impact**

**1.1 Reduction in area**

The Trust notes that the proposed area for this facility has been reduced, and welcomes this change.

**1.2 Proposed haulage road**

The Trust also notes that the proposed haulage road parallel to and abutting the M2 Motorway between the facility and Kirkham Street is still part of the proposal, albeit now as a "temporary" proposal. The Trust strongly objects to any haulage road through the bushland

reserve, instead we are still insisting that the relevant government agencies work out direct access onto the M2.

The Trust notes that the EIS indicates an intention to “reinstate” the site of the haulage road at the completion of works. If a temporary haulage road is to be built through the bushland reserve its exact location will be crucial if the bush is to be reinstated. The topography of the bushland within 20 metres of the M2 fence line (where the proposed road is likely to be located) is particularly rugged, with significant rock formations having cross falls of 5 metres or more. This would necessitate major batters, the filling of gullies and removal of rises (including major weathered sandstone outcrops), destroying the bushland in the area to an extent that would make it impossible to reinstate the area to its original condition. Together with the loss of bushland around the facility the proposed road will impact on an area of close to 10000m<sup>2</sup> (1 ha) of pristine bushland, recreation area and public recreation facilities, including Blackbutt Gully Forest vegetation, which is found in association with the critically endangered ecological communities of Sydney Turpentine Forest (STIF) and Sydney Blue Gum High Forest (SBGHF). Local bush regeneration groups have worked hard over more than twenty five years to bring the area to its present condition, and it is unacceptable that this work should be sacrificed for such a short-term purpose. Any temporary haulage road must be carefully located to minimise so huge an environmental impact for what are essentially temporary works.

The Trust has been informed that the project team has been considering a possible alternative access road which is a single lane road, controlled by lights at each end, largely following the existing walking track. The road would be temporary, for use during construction only, to be removed on completion of work and the site regenerated. A plan of this route, based on the information available to the Trust and from a detailed site evaluation, is annexed to this submission.

The Trust sees this as a preferable alternative. However, it appears from comments made at a site meeting on 29 November 2012 between Trust committee members and North West Rail Link ("NWRL") representatives that it is unlikely to proceed because the proposed road, with two lanes, has already been approved as part of the process under EIS1, the alternative site is outside the approved area, and it would take an additional 3-4 months to reassess the changes and secure fresh approvals. The Trust submits that these reasons are not sufficient justification for dismissing the alternative. The Trust submits that:

- The degree of disturbance along the alternative route along the line of the walking track will be significantly less than the proposed route along the M2 fenceline;
- It will be easier (and therefore less costly) and environmentally better to regenerate along the alternative route, because the terrain is flatter and more even, with deeper soils;
- A single lane road controlled by traffic lights is all that is needed to cope with construction traffic over the construction period;
- The amount of STIF likely to be affected by the alternative route could be substantially less than that which will be affected by the proposed route;
- EIS1 did not properly assess all available locations for the access road, and is flawed for that reason. Now that an alternative route which has less environmental impact has been brought to light, the approval for the access road needs to be reappraised, and the alternate route needs full and proper evaluation.
- The EIS1 approval was for a permanent road. Because the road is now temporary then matters for consideration under s.79C of the *Environmental Planning and Assessment Act 1979* are different. The main activity is effectively reinstatement and

regeneration of the bushland and not road construction. EIS1 must be revisited.

For these reasons the Trust submits that the existing approved location for a permanent road will not necessarily be the best location for a temporary road. The alternative offers a satisfactory outcome with reduced environmental impact, and deserves to be fully and properly assessed.

Should any haulage road proceed in either location, the Trust considers that a bushland management plan needs to be prepared in consultation with Hornsby Shire Council (which owns the affected land). The plan should include collection of seed from adjoining sites at appropriate times and site monitoring for not less than five years. Work should include site reinstatement to the council's satisfaction and perhaps construction of an all-weather walking track. Where possible, rock should be physically removed with slings, stockpiled and protected on site for re-use and replaced as part of the reinstatement process rather than simply broken up on site. The Trust is always available to contribute to any discussions.

### **1.3 Use of Kirkham Street for access**

More importantly, the concept of using the area for ingress to and egress from the facility is fundamentally flawed. The reality is that Kirkham Street is no more than a local road and was never designed for heavy traffic. It is presently subject to a 3 tonne load limit which would ordinarily prevent spoil removal vehicles (which the Trust understands will in the main be heavy rigid trucks with dog trailers) from using it. The EIS predicts that up to 70 heavy vehicle movements per day (i.e. one movement every ten minutes, approximately) will occur, with trucks using Kirkham Street for access to and from Beecroft Road. Even allowing that these movements are anticipated to occur for only about fifteen months, they will seriously overload Kirkham Street. The street is the major link between Beecroft Village and residential areas south of the M2 that feed into it. It is already taxed by the local

traffic that uses it, as witnessed by the congestion that occurs during both morning and evening peaks and the surface degradation which is so frequently apparent. As well, there is likely to be substantial damage to the road's structure.

There will be conflict between existing traffic movements turning north out of Kirkham Street and proposed heavy traffic. Heavy trucks will need to use both lanes of Beecroft Road to complete such turns, with consequent delay to other traffic. This will be exacerbated during school hours and the danger to children crossing Kirkham Street will be increased.

Other infrastructure in the street is also likely to be affected. This is particularly so of Sydney Water's water reticulation mains, which are old and already fail regularly, largely due to the effect of existing traffic. The impact of an additional 70 heavy vehicle movements per day can only cause a significant increase in the rate of water main failure in the area.

#### **1.4 Wider traffic issues**

The EIS indicates that the majority of traffic from both the Cheltenham facility and the work site at Epping will be directed northwards along Beecroft Road, adding another 170 heavy vehicle movements per day (say two trucks every five minutes) along Beecroft Road between Carlingford Road and Pennant Hills Road. Beecroft Road is already a major traffic artery which is seriously congested in peak hours, and adding this volume of heavy traffic will only exacerbate existing problems. The Trust notes that there are four schools (Cheltenham Girls' High School, Beecroft Public School, Arden Junior School and Mount St Benedict Girls' High School), two nursing homes (Chesalon and Beecroft) and the Beecroft shopping centre along this route. There will be significant disturbance to all of them as a result of the increase in traffic volume, from the point of view of both safety and the health and convenience of occupants.

The Trust supports the contention that the only satisfactory option appears to be the use of the M2 Motorway for the fifteen month period necessary to build the facility. Heavy vehicles leaving the site should travel in an easterly direction to Christie Road, cross over the motorway, and return in a westerly direction to Pennant Hills Road. Trucks entering the site should return from Pennant Hills Road and travel in an easterly direction to the site. The Trust notes that the M2 was used for removal of fill from the excavation for the Epping-Chatswood rail line, and sees no reason why it should not be used again.

In addition, no proper consideration appears to have been given to emergency access to the Cheltenham Oval site in the event of an incident on the NWRL. There appears to have been no consultation with the NSW Police, NSW Fire and Emergency Services or NSW Ambulance Service about their emergency access requirements. Logic suggests that emergency services will need to access the site by the most direct route to ensure that the least amount of time is lost in responding to an emergency, and that the most direct means of access is from the M2. It is virtually on grade with the site and the distances involved are short. Accessing the site by way of local roads is less direct, and the time lost could make a significant difference in an emergency.

## **2. The change from heavy rail to metro style trains**

The Trust has concerns about the reasons given for this change. There has been no proper explanation given as to why the change was ever considered at all. It contradicts the Government's pre-election promotion of heavy rail to Rouse Hill and, in the future, to link with the Richmond line. The EIS fails to give a proper explanation of the longer-term integration of the metro system with the heavy rail network.

A metro system works well in locations with large passenger volumes and short transit distances. Sydney, in comparison, has smaller volumes and much longer distances. A passenger joining a service on

the NWRL, particularly at peak times, has a fair chance of being required to stand for most of the journey – 30 minutes or more. Most Sydney commuters would take exception to this. Because the NWRL, if operated as a stand-alone metro system, will have to be co-ordinated with existing heavy rail services, most of the time benefits which might otherwise appear will be lost.

The Trust notes that it is now proposed to bore the new tunnels for the NWRL at a size to suit new, single-decked carriages. This is short-sighted. Boring to the smaller size will mean that the NWRL will essentially be a stand-alone system incapable of being fully integrated with the rest of the Sydney rail network. The Trust recognises that there are long-term plans to extend the metro network, but notes that there is no firm timeline for this action. Unless such a timeline is confirmed, rail commuters will be justifiably cynical about these plans. Boring the tunnels to suit existing heavy rail rolling stock would at least ensure that the NWRL can be integrated, so that if the longer-term plans do not eventuate the inconvenience to travellers will be minimised.

### **3. Integration with the proposed Epping-Parramatta line.**

The EIS does not address the existing proposal for a connecting line between Epping and Parramatta. This cannot be disregarded. It is already clear that this proposal is a vital part of any expanded Sydney rail network. It formed part of the line from Parramatta to Chatswood that was subsequently terminated at Epping. It was designed for heavy rail, as a connection between the existing Western and North Shore heavy rail lines, and by its very nature can only be practicable or viable as a heavy rail link. Building the NWRL as a metro system and using the Epping-Chatswood link for the purpose would either render the link redundant or necessitate the construction of a second, heavy rail, link between Epping and Chatswood. Neither option makes sense.

### **4. Integration with existing services.**

The EIS glosses over the integration of the metro-style NWRL with existing services. The public has been told on numerous occasions that



the Harbour Bridge is at near maximum capacity, dealing with 18 train movements per hour in each direction when the maximum capacity is 20 movements. It is the case that four of those movements are for trains to Hornsby via Macquarie Park, leaving 14 movements per hour to be directed to the North Shore line. This suggests significant inefficiencies in the allocation of rolling stock. Even allowing that four of these movements are for Western line services to Penrith/Emu Plains via Blacktown and another four are directed to the Richmond line, there are still 6 movements per hour to deal with services between Chatswood and Hornsby that do not proceed to a Western line service. Taking two of these and adding the two movements not presently being used would allow four heavy rail services to be directed to the NWRL without disruption to existing Northern services.

#### **5. Services between Epping and Hornsby**

The proposal to run the NWRL as a metro-style system has other problems, particularly for commuters joining the rail system between Epping and Hornsby. These are not addressed in the EIS. A commuter joining at stations between Epping and Hornsby and travelling to the city via Chatswood can presently complete the trip without having to change trains. Under the NWRL proposal that commuter would be forced to make two changes: from heavy rail to the metro at Epping and from the metro back to the heavy rail network at Chatswood. This will cause both inconvenience and longer travel times. The inconvenience would occur at both change points. Presumably the Up services from Hornsby to Epping will arrive on the ground-level platforms at Epping, rather than on the underground platforms there. This will make it necessary for travellers to make their way down to the metro line for the trip into the city and back up for the return trip, and the need to change again at Chatswood when travelling in either direction will cause substantial congestion on the platforms there. These problems will be more serious for travellers in wheelchairs or with other disabilities and are not consistent with Transport for New South Wales' Mission Statement that "the customer is at the centre of



everything we do in transport". If the proposal goes ahead it will have a substantial negative effect on residents north of Epping to use public transport, and may in fact prove a disincentive for them to use public transport.

The same commuter would also be fortunate to secure a seat on a metro train, particularly during peak hours. Given the large catchment from which the NWRL will draw, it is fair to say that most, if not all, seats will be occupied by the time trains arrive at Epping. This compares unfavourably with the present situation, where a commuter joining at Beecroft can be reasonably sure of finding a seat.

The Trust also has been informed that Hornsby to Epping commuters will have the option of staying on the train at Epping and continuing to the city via Strathfield. The EIS is silent on this issue and other crucial matters such as frequency in both peak and off-peak hours and also whether there will be faster services in peak hour where certain stations are skipped. If all services are to be all stations and running at 30 minute intervals then Transport for NSW has failed in its Mission Statement. The EIS is deficient in addressing these important issues.

## **6. Other issues.**

On a wider view, the NWRL does not address the more fundamental problem now facing rail travel in the Sydney region, which is the congestion between Central and Milsons Point stations. Both Wynyard and, more especially, Town Hall stations are operating at or beyond capacity already, particularly during peak hours, and the addition of more passengers from the NWRL will only exacerbate the difficulties now apparent at those stations. As well, the Harbour Bridge is near to capacity, and there are real doubts as to its capacity to handle the additional traffic which the NWRL will generate: as noted above, the Trust understands that there is capacity for only another two trains per hour, but estimates that there will be a need for an additional four to six trains per hour once the NWRL is operating. The Trust submits that the primary focus should be on removing this bottleneck, so that increased

traffic volumes can be handled without difficulty and there is room for the traffic generated by new lines wherever they may be.

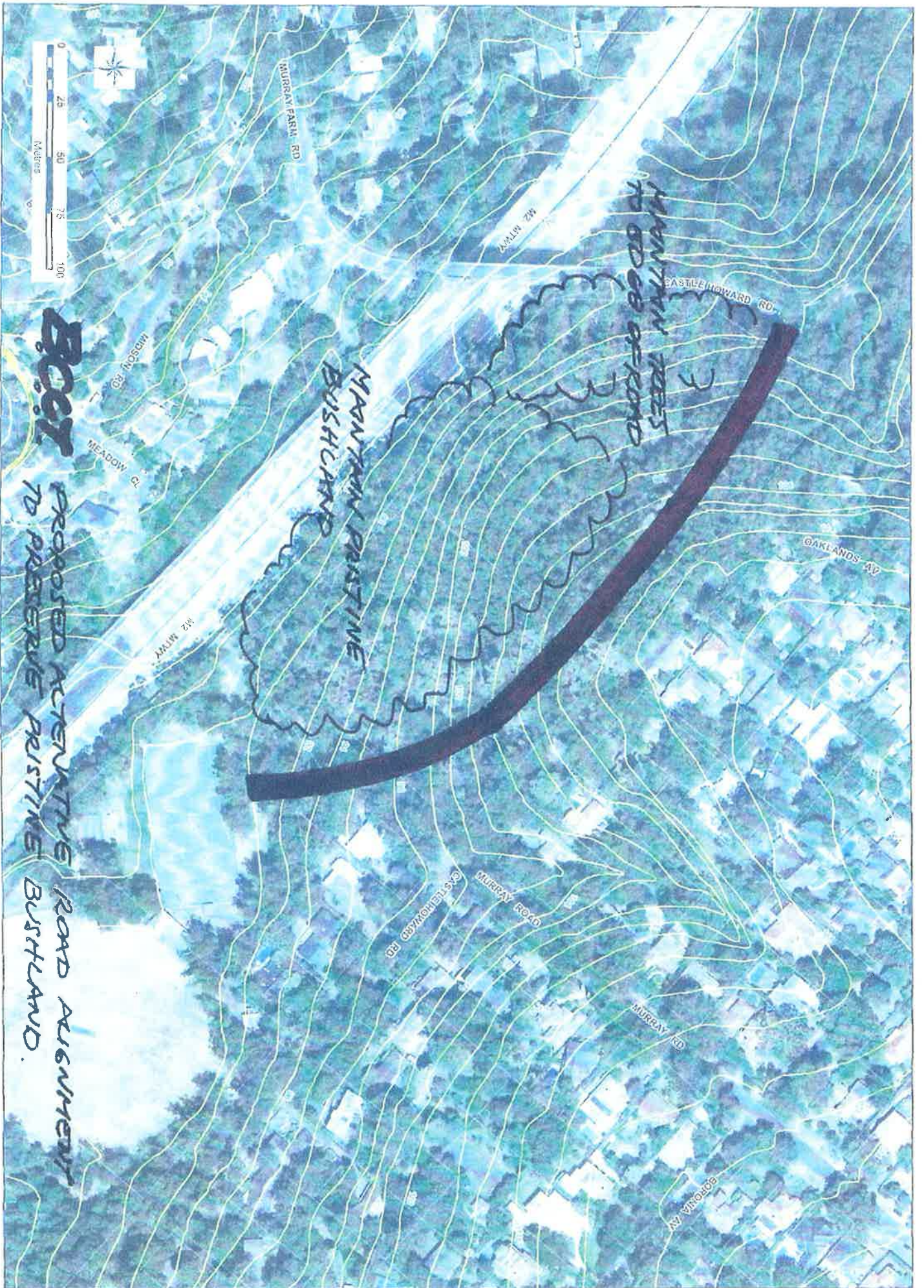
A handwritten signature in black ink, appearing to read 'Michael Stove', with a large, stylized initial 'M'.Small handwritten initials, possibly 'MS', in black ink.

Michael Stove

President

3 December 2012





**BOC** PROPOSED ALTERNATIVE ROAD ALIGNMENT  
TO PRESERVE PRISTINE BUSHLAND.