Submission on the Berrima Rail Project

by R.T. Frost

Summary

I oppose the Berrima Rail Project because the main Southern Rail line to and from Sydney will become even more congested than it already is; the proposed project will create additional and unacceptable delays to road traffic; and the noise will be unacceptable.

The Berrima Rail Project needs to proceed hand in hand with the Hume Coal Project as without a joint approval they will both fail. The mine cannot proceed without rail transport to the coast and without the mine there is no need for the Berrima Rail Project.

Congestion of the main Southern railway line to Sydney

My primary issue with the Berrima rail DA is that its treatment of the main Southern Rail line is inadequate. The DA has considerable detail but mainly only on the proposed expansion of the Berrima Branch Line. This line already services the Boral cement works and the Ingham chicken feed storage silos and the expansion includes a new rail loop and locomotive maintenance sheds. There is however only the most cursory examination in the EIS of how the increased rail traffic from the expanded Berrima Rail Loop interfaces and interacts with the main Southern Rail Line. The main Southern Rail line to Sydney is a very winding railway. For years there has been discussion of straightening the line to allow higher speeds but this has never been done and hence the line is already old and slow. Residents of the Southern Highlands who work in Campbelltown and Sydney already experience great difficulty in getting to work on time and the journey is already tortuously slow.

The DA for the Berrima Rail Project requires the use of the main line for a distance of only 1.6 km in order to transition from the Berrima Branch Line onto the Moss Vale to Ununderra rail line to the coast but this short distance is critical as it creates a new and unwanted bottleneck. The DA provides no satisfactory analysis of the effect of 8 new train paths a day on this 1.6 km stretch of line. Regardless as to whether or not the Tahmoor colliery closes and removes 4 train paths a day from the rail network the fact remains that 8 new coal train paths a day will be needed along this 1.6 km stretch of line. This new loading can only have a negative effect. This adverse effect is brushed over and not properly analysed in the DA.

The DA argues that the construction of a new siding at Moss Vale (I km long) will allow coal trains to be parked waiting for the opportunity of a suitable path opening along the main line. I see no analysis of this and no analysis of the potential flow on effects. None of the drawings or words in the EIS, that I have seen, focus on or show a proper discussion of the impacts of 8 new train paths a day on the main Sydney line.

What is needed to properly consider the DA are details as to how it is proposed the main Sydney rail line can handle, over time, the new congestion that will be caused by 8 new train paths a day on this line. This proposed increase in new coal traffic also needs to be considered together with normal rail business which includes expectations of increased traffic flows and of increased freight traffic and increased passenger traffic over the next 30 years.

Port Kembla

It is noted in the recent Proposed Access Regime for Port Kembla (which includes the Moss Vale Ununderra Line and the Illawarra line) that passenger capacity by 2031 is expected to increase by approximately 40% and that by 2020 the movement of containers by rail will double to approximately 30% (existing is approximately 15%). These increases will have a significant impact on the overall rail capacity and the freight paths available for freight trains servicing the Port Kembla Port.

By way of example, the Port Kembla Coal Terminal (PKCT) has available a current review of the operating regime which includes the following issues.

1. Train paths available on the network – freight and passenger (hourly)

2. Usage of the rail network at least at hourly intervals

3. Impact of track possessions on freight paths (paths lost)

4. Signalling/rail infrastructure downtime

5. Delays due to rolling stock malfunction, derailment, etc.

6. Trains delayed due to network issues

7. Train paths booked but not used – to avoid path banking.

There is no equivalent comprehensive traffic analysis in the EIS.

Another objection I have is that while the present main rail line has some notional limited spare capacity as the system is not operating at 100% capacity, no rail system works well at 100% capacity as there must always be spare capacity left within the network for contingencies. **In my view all existing spare capacity on the main Sydney line needs to be reserved for future growth in normal passenger and freight traffic.** Hume wishes to quarantine much of this spare capacity for its own use and this is unacceptable to other rail users. I would prefer the Berrima Rail Project to avoid use of the main line in its entirety. One obvious way of avoiding the Main Southern Line entirely is to build a rail overpass or tunnel under the Main South Line. I see no discussion of this. I accept that a rail underpass or overpass for the main Sydney line will cost money but saving Hume Coal capital expenditure is not a sufficient reason for failing to protect the main Sydney line from unwarranted and unnecessary congestion and increased passenger delay (now and in the future) when that congestion can be easily avoided by Keeping trains from the proposed Hume Coal mine off the main line completely.

Consideration of the curfew at Port Kembla is inadequate

A condition of consent for the new Dendrobium Mine which also uses Port Kembla is the imposition of a curfew in Port Kembla on the operating hours for the rail link. This curfew currently limits rail transport to between the hours of 6.00 am and 11.00 pm only and is primarily to avoid noise at night. This means no rail operations at all for 7 hours at night. The effect of the curfew is that in order to maintain throughput, train movements outside of the curfew hours need to be increased and there is an automatic reduction in available capacity of 7/24ths or 29% at the Port Kembla coal discharge hoppers resulting in a sub-optimal use of the rail infrastructure, including locomotives and railway wagons, which must perforce lie idle during the curfew hours. This can be compensated for in some measure by banking trains up waiting for the available train paths once the curfew is lifted at 6.00 am but Port Kembla is already stretched and the EIS does not explain how it is proposed to

get its trains through the PKTC system in the available time. Grain trains from across NSW and coal trains from the Bendrobium Mine and the Appin Mine also want to use the Port facilities and there will be congestion in Port Kembla also. A more thorough traffic analysis is clearly needed.

The Hume Coal mine operates in a very similar operating environment to that of the Dendrobium mine and is similar but slightly smaller in size (3mt coal as opposed to 5mt coal). I see no discussion in the EIS, however, of the effect of this curfew on the transport of coal by train on the Moss Vale Ununderra Line. The following questions therefore come to mind.

1. Will Hume Coal be asking at any future time for the rail curfew at Port Kembla to be lifted?
2. Berrima is a closely settled rural and residential area of great heritage value. If the residents of Port Kembla can have a curfew imposed to limit rail noise can the residents of Berrima and perhaps also Moss Vale have a similar curfew? What will be the effects on the proposed new mine if a rail curfew is imposed at Berrima or Robertson?
3. Where will loaded and empty coal trains be held during the curfew hours if the present curfew at Port Kembla is maintained as is to be expected?
    a. Is there a need for new sidings to be created at Port Kembla to hold parked coal trains waiting for the curfew to lift?
    b. Is the single new siding proposed at Moss Vale sufficient?
    c. Are new and longer sidings needed on the Moss Vale to Ununderra line?
4. What are the additional noise issues created by train and locomotives idling and stop/starting along the rail network due to the curfew?
5. What new signalling and traffic control measures need to be put in place?
6. The Port Kembla curfew needs consideration, not only in the interest of rail efficiency, but also in the need to manage the additional noise caused by the flow on effects from freight trains having to stop and start at various times throughout the entire rail system.

The EIS does not cover the above and yet they are all reasonable questions. The EIS needs a better analysis of the flow on effect of the Berrima Branch Line expansion on Passenger and other freight trains on the Main Southern Line and on the Moss Vale to Ununderra Line. The curfew at Port Kembla also needs to be properly considered and discussed.

<u>Unacceptable delays to road traffic</u>

There are numerous public and private rail crossings on the Moss Vale to Ununderra line. These are mentioned in the EIS. My concern is that good engineering needs to allow for the unexpected. I would like to know how the coal mine will respond to one of its trains blocking a crossing on a main road for extended periods of time due to congestion or problems elsewhere in the system.

<u>Unacceptable noise</u>

I note the proponent proposes to use new locomotives and new coal wagons and that the intention is to keep trains that are being loaded under constant tension so that shunting noise is minimised. I note the building of noise walls and of plantings to soften noise. This is laudable and it seems that the proponents are doing what they can to minimise noise but the fact remains that there will be a considerable and significant new noise adjacent to Berrima, Moss Vale, Robertson and elsewhere along the railway. This loss of social amenity needs to be given more importance as it adds to the cumulative problems caused by this proposed mine.

Conclusion

For all of the above reasons I ask that the DA for the rail expansion to serve the proposed coal mine not be approved unless the resultant traffic is removed from the main railway line. A rail overpass or underpass are equally feasible and the cost should be borne entirely by the proponent of the mine and not by inconvenience and delay to the general public.

Thank you for the opportunity to comment.

R.T. Frost

Sutton Forest

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