NSW Dept. Planning and Environment

Adam Jacobson
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25/06/2017

Dear Sir/Madam,

Project References: SSD 15_7171
SSD 15_7172

Submission for:
Hume Coal Pty Ltd - Berrima Rail Project, Environmental Impact Statement (EIS)
Hume Coal Pty Ltd - Hume Coal Project, Environmental Impact Statement (EIS)

I am a resident of the Southern Highlands NSW and frequent commuter to Sydney on rail services that utilise the Main Southern Line.

Additionally, I am a co-founder of a Southern Highlands and Wollondilly community action group, *80by20*, that since 2014 has advocated for improved passenger rail services on the Southern Highlands Line.

Please find my submission for the Berrima Rail Project and related Hume Coal Project.

Yours Sincerely,

Adam Jacobson

Preamble

Hume Coal Pty Ltd have highlighted within the EIS documents that the Berrima Rail Project and Hume Coal Project are inextricably linked. Therefore, this submission may be considered congruent and related to both the Berrima Rail Project and the Hume Coal Project.

Environmental Assessment Requirements

The Environment Assessment Requirements for the Berrima Rail Project (and similarly the Hume Coal Project) include the following analysis requirement for Transport:

> *An assessment of the likely transport impacts of the development on the capacity, condition, safety and efficiency of the local and State road network and the rail network, having regard to Transport for NSW's and RMS's requirements…*

Further, the following rail assessment recommendation item is provided by Transport for NSW:

> *Detailed assessment of the proposed project on the capacity, efficiency and safety of the rail networks, including level crossings.* ***The assessment is to consider the cumulative impacts to network users (including and beyond that of the branch line) and recommend mitigation measures in response.*** (Emphasis added)
>
> Hume Coal EIS, Appendix B (SEARs); Berrima Rail Project EIS Appendix G (Traffic and Transport Assessment Report), Table 1.2, Line 4

The relevant information relating to these requirements is provided by Hume Coal within the following EIS parts:

- Berrima Rail Project EIS
    - Chapter 9 (Traffic and Transport)
    - Chapter 16 (Hazard and Risk Assessment)
    - Appendix G

  Note: the Berrima Rail Project EIS also forms Appendix D of the Hume Coal EIS

- Hume Coal Project EIS, Volume 1, Part D
    - Chapter 15 (Traffic and Transport)
    - Chapter 18 (Hazards and Risk)

  Note: the Hume Coal Project EIS, Appendix M (Traffic and Transport Assessment) contains no relevant information pertaining to impacts on the rail network.

Passenger Services on the Main Southern Line

The Main Southern Line broadly supports the following passenger services, primarily operated by NSW Trains:

- XPT services between Sydney and Melbourne
- Xplorer services between Sydney and Canberra
- Intercity commuter services between Sydney and Moss Vale, extending to Goulburn
- Occasional special heritage services between Sydney and Robertson

All services, save for an occasional heritage steam train, are diesel-powered as the track south of Macarthur is managed by Australian Rail Track Corporation (ARTC) under the terms of a 60 year lease and is not electrified.

Intercity Service Performance

Intercity commuter services run by NSW Trains suffer from markedly poor on-time running performance in comparison to all other NSW intercity and suburban lines.

Target on-time running performance for services is set at 92%. The following table sampling various services demonstrates the relative poor performance of intercity services on the Southern Highlands Line, where up to half of specific services experience disruption. The same performance pattern is demonstrated by similar reports and statistics for previous years.

NSW Trains: intercity									
Inter-city	Blue Mountains	94.1	90.9	86.5	91.7	90.1	89.5	90.4	89.9
	Central Coast & Newcastle	92.4	85.5	85.4	93.5	88.7	85.3	90.6	87.9
	South Coast	96.1	89.1	84.4	87.0	88.3	85.5	92.1	88.8
	Southern Highlands	--	--	50.3	--	50.3	76.4	78.1	77.2
Intercity Overall		**93.9**	**88.1**	**84.7**	**91.4**	**88.7**	**86.1**	**90.6**	**88.4**
Total		**94.5**	**95.3**	**91.1**	**94.9**	**93.9**	**94.5**	**95.7**	**95.1**

Table 1: Punctuality of trains departing from Central from 1 July 2015 to 31 March 2016
Source: Exhibit A4.2, Audit Office of NSW, Rail Punctuality Report, 11 April 2017, Appendix 5

NSW Trains attributes around 60% of the intercity service's poor performance to track and freight train issues (ARTC), as demonstrated by analysis of 3388 late-running intercity trains between November 2015 and April 2017 (refer provided GIPA dataset). This disruption data does not include other affected passenger services such as XPT or Canberra Xplorer.

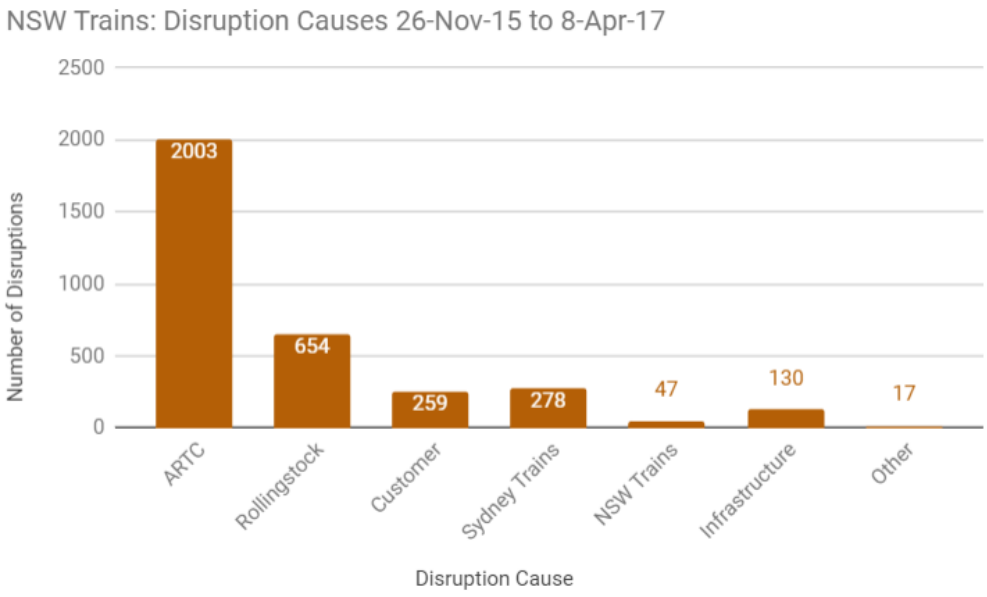


Figure 1: NSW Trains: Disruption Causes 26-Nov-15 to 8-Apr-17
Source: NSW Trains, GIPA request NTR-000024, Late Trains

Existing Impact of Rail Disruptions on Community

Poor performance of passenger services on the line is an ongoing frustration for rail users in the Wollondilly, Southern Highlands and Southern Tablelands communities. Many people in these communities use rail services to travel to Sydney for medical appointments, air travel or for work.

Consequently, two respective community action groups have formed to advocate for improved rail services, both of which have featured prominently in local media over recent years:

- *80by20* - Wollondilly and Southern Highlands - www.80by20.com.au
- *Southern Tablelands Rail Users Group (STRUG)* - Goulburn - www.strug.net.au

The formation of these groups to lobby against further service degradation demonstrates that passenger rail services using the Main Southern Line are an important and sensitive topic for the communities surrounding the proposed Hume Coal and Berrima Rail projects.

EIS Impact Analysis

The Main Southern Line is a key route for freight and passenger services between Sydney and Melbourne.

Data supplied from NSW Trains demonstrates that freight train movements and associated track issues are the primary and enduring cause of intercity passenger service disruptions that also implicitly affects interstate services.

A sufficient and robust impact analysis is required to evaluate the effect of proposed additional freight movements on the Main Southern Line. The Berrima Rail Project EIS component presented by Hume Coal Pty Ltd consists of two broad-reaching paragraphs constituting an impact analysis of proposed freight trains on the Main Southern Line:

> *Future coal and other freight trains will require gaps of about ten minutes between the existing timetabled northbound and southbound passenger and freight train paths on the Main Southern Rail Line at Moss Vale, to cross between the junctions with the Berrima Branch Line on the western side and the Unanderra Line on the eastern side.*
>
> *These train movements will only occur over a short (1.6 km) section of the Main Southern Rail Line. The additional train 'cross over' movements will occur during slack periods in the existing timetable and will have a minimal effect on the overall Main Southern Rail Line capacity for longer distance passenger and freight train movements. Further, the Main Southern Rail Line consists of triple-track for most of the cross-over distance.*
>
> Berrima Rail Project EIS, Part 9.4.3ii

Review of Impact Analysis

Scope of Analysis

- The recommendation from Transport for NSW includes a cumulative impact analysis for users of the network including and beyond the branch line, and associated mitigation measures.
- The actual impact analysis is limited to a 1.6km section of the Main Southern Line and does not consider further network impacts or recognise the proximity, role and importance of Moss Vale station immediately to the south as a main regional station.
- Despite freely available data demonstrating that most passenger services are disrupted by freight/coal trains, the impact analysis has not adequately considered interactions between coal trains and the relatively frequent passenger services.

In a separate section recognising four existing coal trains using the network, Hume Coal state:

> *It is noted that Tahmoor has development consent to continue mining until 2021, although Glencore announced in mid-2016 that mining is expected to cease there by early 2019. It is therefore likely that the four Tahmoor trains listed above will not be operating when the Berrima Rail Project commences operations.*
>
> Berrima Rail Project EIS, Part 9.3.2

- An announcement on 9-May-2017 by Tahmoor Coal instead indicates 'business as usual' up to the point of sale of that mine, and activity post-sale will be speculative.
- The Tahmoor coal trains cannot therefore be discounted from the impact scope and existing disruption patterns to passenger services (and level crossings) are likely to continue.

Reference: http://www.tahmoorcoal.com.au/en/Documents/Media-statement-Glencore-begins-sale-process-for-Tahmoor-underground-mine-in-NSW.pdf

Level of Analysis Detail

With regard to the Main Southern Line and related passenger services, the impact analysis:

- Fails to identify and analyse expected contribution of an additional 50 train movements/week to the further degradation of passenger service performance, which is already significantly attributed to existing coal and freight services.
- Fails to extend impact analysis to train movements around Moss Vale station immediately south of the Moss Vale-Unanderra branch line and is a main regional station.
- Fails to identify risks associated with trains transecting the Main Southern Line, such as a train completely blocking all up/down passenger and freight services on the line.
- Fails to provide any proposed mitigation of risk for further passenger service degradation.
- Fails to provide any proposed mitigation of risk for partial/complete blockage of the Main Southern Line.

Comment on Timetabling

In EIS section 9.4.3ii it is suggested that coal trains will require gaps of about ten minutes between the existing timetabled services. Additionally it is suggested that the train 'cross-overs' will occur in slack periods in the existing timetable. Finally, in section 9.4.3v:

> *Network modelling using the OpenTrack software modelling package and current ARTC/TfNSW timetables has confirmed the availability of sufficient capacity on the network between the future mine site and Port Kembla.*

- No evidence of this modelling for either timetabling or capacity purposes has been provided within the Environmental Impact Statement or attached appendices.
- No diagrams or mapping of the proposed 'cross-over' movements have been provided
- Consequently, none of the statements in 9.4.3ii or 9.4.3v can be adequately verified

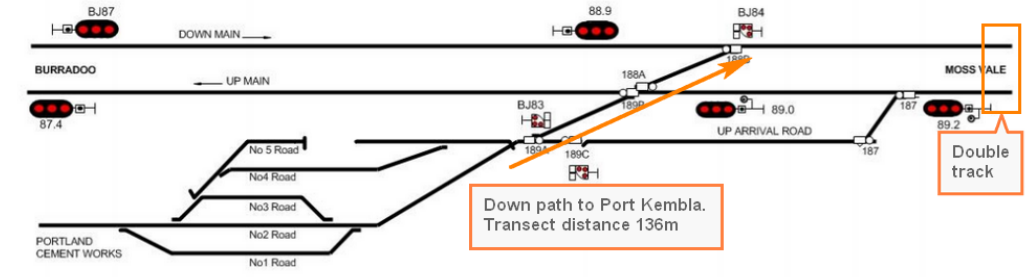
Comment on Track Configuration

The EIS states in section 9.4.3ii:

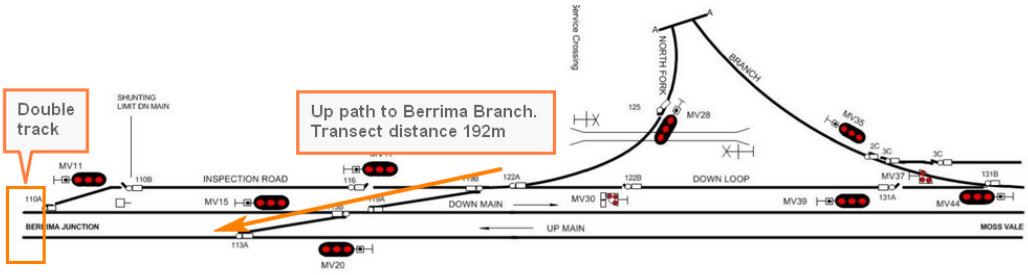
> *Further, the Main Southern Rail Line consists of triple-track for most of the cross-over distance.*

- The statement seeks to reduce the perceived risk to the broader network from coal trains negotiating that transect ('cross-over').
- The statement misrepresents the actual track and points configuration for trains needing to transect the Main Southern Line. Once a train has performed a transection, most of the usable track is actually double-track.
- ARTC diagrams demonstrate that given the points configuration for up/down traffic, a train must necessarily completely block the line while negotiating the transect.
- ARTC diagrams and freely available maps demonstrate the triple-track sections are merely lead-ins to the branch lines and do not ease movement of other rail traffic in the event of a problem with a train transecting the line.
- There is a 'weak-link' of double-track across a bridge at GPS co-ordinates -34.5317, 150.3796. This would require a new bridge to expand the line to triple-track.

1. Main Southern Line and Berrima Branch Line



2. Main Southern Line and Moss Vale-Unanderra Branch Line



3. Moss Vale-Unanderra Branch Line and Moss Vale Station

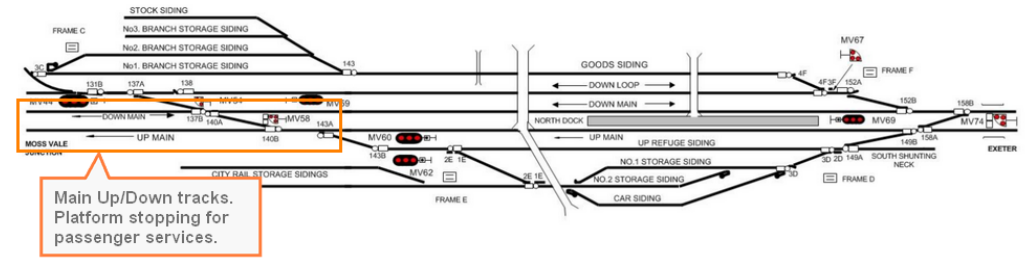


Figure 2: ARTC line diagram - transect paths, double track, proximity to Moss Vale station
Source: ARTC Book number OGW-30-28 - Main South A

Conclusion and Recommendation

A review of the Hume Coal Project and Berrima Rail Project EIS documents provides insufficient detail to justify that there will be minimal impacts to network users on the Main Southern Line.

Transport for NSW recommended that the analysis extend beyond the proposed branch line project and include the users of the network. Such affected users may include interstate, intercity, and local passengers who are travelling for leisure, work, medical or school purposes.

The issue of passenger service disruptions is sensitive within the community. Most passenger service disruptions on the line are attributed to coal/freight trains. Hume Coal propose to add 50 coal trains per week transecting the Main Southern Line. It is therefore reasonable to expect Hume Coal Pty Ltd to have supplied analysis with sufficient detail, supporting data, and risk mitigation measures. Despite the recommendation from TfNSW, none of these have been supplied.

Additionally, it is my opinion that perceived risks to the Main Southern Line have been downplayed by misrepresenting the relevant track configuration as "mostly triple-track". This does not consider required train movements that may present a risk of full stoppage on the line.

It is my recommendation that the Transport impact analysis within the EIS be considered not sufficiently robust and currently unable to justify coal train movements across the Main Southern Line.
