

Monday, 21 May 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 1 (SSI-5100)

I write with reference to the opportunity to provide comment on the first Environmental Impact Statement relating to the construction of the North West Rail line – application no. SSI-5100.

Busways supports this proposal for the commencement of construction works associated with the anticipated North West Rail line, acknowledging the strategic importance of this project as a plank in the overall provision of public transport to the north-west area of Sydney.

Busways also acknowledges that: *“The major civil construction works would require a number of modifications to existing public transport facilities where they would interface with the construction works. Modifications would be necessary in order to allow existing public transport to remain functional and safe during the construction works.”* (Chapter 7, page 7-46: section 7.10.6)

Notwithstanding the intention to *plan* to accommodate current public transport services, it is extraordinarily important that this objective is carried through in minute detail – most especially at both Castle Hill and Rouse Hill Town Centre.

These two public transport hubs not only support a multiplicity of *operational* bus movements, they also provide space for *short and long term bus layover*, thus enabling bus-driver-meal-break-opportunity, and access to parking for toilet amenities.

It is critical that no additional bus travel distance or time is encountered when negotiating temporary arrangements. Bus network scheduling is most often, and for the sake of efficiency and effectiveness, pared down to minute tolerances, thus even small additional burdens can cause a whole network to fail – not just those buses that actually encounter the delay.

Further to this, it should be planned to implement such superior initial temporary modifications to current arrangements, that the need for subsequent changes is minimised. This is especially important for Busways customers, for who repeated change can introduce vagaries that result in a sub-standard transport experience.



Lastly in this regard, there must be a preparedness to modify plans at short notice. It is imperative that a flexible approach be adopted, such that problems resulting in delays to bus services can be readily overcome on a day to day, even hour to hour basis.

In conclusion, and in accordance with the Director General's Requirements and Conditions of Approval, it is important that Busways be considered not only from the standpoint of being a public transport provider, but also, in the terminology of the EIS, a 'local business'.

The approach adopted in the EIS in relation to impact on businesses (i.e. locality based – revolving around each proposed station precinct), fails to identify that as a bus operator, Busways is a 'local business' in most if not all of the locations.

Therefore, while a given business may be affected in an *isolated* and *discrete* manner, Busways will be affected in a *cumulative* and *broad* manner. A delay at one location will almost certainly be compounded upon by delays at another location.

Consequently, and however this impact is measured against a static business, and whatever assistance is afforded it, this must be employed and meted out to Busways as a *mobile 'local business'*.

Busways appreciates the opportunity to comment on this EIS, and I can be contacted on 0438 537 977 if further comment, or any clarification, is required.

Yours Sincerely
BUSWAYS Group



Dave Davies
Planning and Infrastructure Manager