

Tracy Bellamy - SUBMISSION ON PROPOSED EPPING TO THORNLEIGH THIRD RAIL TRACK PROPOSAL

From: "Malcolm Powell" <powellsyd@ozemail.com.au>
To: "Director Infrastructure Assessments" <plan_comment@planning.nsw.gov.au>
Date: 2/11/2012 3:31 PM
Subject: SUBMISSION ON PROPOSED EPPING TO THORNLEIGH THIRD RAIL TRACK PROPOSAL
CC: "Greg Smith" <epping@parliament.nsw.gov.au>
Attachments: SUBMISSION TO NSW DOP ON EIS FOR ETTT PROPOSAL - 31 Oct 12.doc

Director - Infrastructure Projects
Epping to Thornleigh Third Track Project - SSI 5132
NSW Department of Planning and Infrastructure
GPO Box 39 Sydney NSW 2001
Email plan_comment@planning.nsw.gov.au

Attached please find my submission on the proposed Epping to Thornleigh Third Rail Track presented to accommodate an increase in freight rail movements.

As presented in my submission the existing rail corridor with high operational use for CityRail and CountryLink trains is entirely unsuitable for the proposed third track enhancements.

Proper costing analysis (including social costs from noise impacts well above regulated levels) and operational cost analysis would expose the project funding allocation as a waste of scarce government resources.

The proposal should therefore be abandoned in favour of real solution alternatives such as an inland rail connection from Port Phillip Bay in Victoria to Brisbane Queensland intermodel depots.

A reply dealing with the issues raised in my submission would be greatly appreciated.

A copy of the cost benefit analysis (CBA) used to justify the project, which should be available under GIPA rules for community research, would be greatly appreciated.

Finally, complete information on the methodology used to assess submissions made would also be greatly appreciated to ensure full transparency for assessment of submissions. We would also like to know the number of submissions made.

Malcolm Powell

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SUBMISSION ON PROPOSED EPPING TO THORNLEIGH THIRD RAIL TRACK
FOR NORTHERN SYDNEY FREIGHT CORRIDOR

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This submission is made in response to attendance at various community information sessions and examination of the EIS and other documents presented for the project. The project has been advanced over an 8 year period for the benefit of privatised rail freight operators without consideration of community degradation impacts and other adverse social costs. I strongly oppose this third rail project for the following reasons

Adverse Living Amenity Impacts Between Epping and Thornleigh

- In recent years increasingly longer freight trains (up to 1.5km in length) have been using the main Northern Line with highly adverse noise impacts from wheel flange squeal and old diesel locos used to haul freight cars up the very steep incline which includes a sharp curve between Beecroft and Pennant Hills stations (known as the Beecroft Bank). The project will not attenuate or reduce this noise impact which researched by a NSW Government agency in 2006 confirmed greatly exceeded regulated levels.
- As the proposed Third Line will be installed on the Western side of the existing two rail tracks it will seriously interrupt high level use for commuter and other rail movements. Therefore proposed work will need to be mainly carried out at night when there are better opportunities to retro-fit requirements into the existing rail corridor. This will greatly increase noise responsible for sleep disturbance and other impacts.
- The EIS **lacks equity** in not considering the high social costs of the project and **integrity** from inadequate assessment of noise and other impacts. **Approval should be rejected on these two grounds alone.**

Fictional Claims of Project Benefits.

- The steepness of the grade between Beecroft and Pennant Hills in the middle of the proposed project alignment presents many operational safety issues. It is impossible to re-engineer the steep grade on the Beecroft Bank to remove these issues. It is nonsense to claim that the project will enhance rail freight movements in the Epping to Thornleigh rail corridor to cater for even more future rail freight trips.
- Claims that 200,000 heavy vehicles will be taken off the road are a fiction. Truck delivery arrangements offer convenience and flexibility which cannot be offered by rail. Furthermore, reducing diesel use by almost 40 million litres per annum may be unlikely to be supported by hard evidence. Finally, the claim that annual greenhouse emissions will be reduced by 100,000 tonnes is fanciful. This claim cannot possibly result from greatly increased rail traffic – the stated goal which has initiated the project.
- The existing main Northern Line between Strathfield and Newcastle was constructed in the late 19th Century without the benefit of modern equipment and civil engineering knowledge. Geotechnical issues in the landslip area on the Beecroft Bank have not been addressed.

Vested Interests for Advancement of the Project

- Following the 2008 Global Financial Crisis (GFC) Government initiated economic stimulus projects with highly questionable outcomes. This project aims to escape scrutiny in this context. It may therefore be classified as unreasonable and unfeasible. Health costs from noise impacts are too great to accommodate the project. Government Agencies routinely fail to present competent overall project analysis as a first step focussed on achievable outcomes. Instead Government Agencies waste scarce resources on plans destined to fail. **The cost benefit analysis used to justify the project is unavailable for research.**
- Both NSW State and Federal Government agencies without proper outcome analysis promote 'new and improved infrastructure' without properly considering whether the existing infrastructure may be better used. Consultants and vested interests actively promote such projects. They derive assured income, often knowing the projects must ultimately fail to deliver stated outcomes.
- The approval process for this type of project has become a workback arrangement for a predetermined outcome for privatised rail freight operators and ignores community degradation and other social costs.

