

From: Carolyn <carowatt@ozemail.com.au>
To: "plan_comment@planning.nsw.gov.au" <plan_comment@planning.nsw.gov.au>
CC: "office@berejiklian.minister.nsw.gov.au" <office@berejiklian.minister.nsw.gov.au>
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Subject: Response to the EIS for the ETTT

Response to the EIS for the
Epping to Thornleigh Third Track
Application SSI 513

I strongly object to the proposal for the Epping to Thornleigh Third Track project(ETTT). The Environmental Impact Statement ("EIS") published in support of the project is severely deficient for the following reasons:

1. The EIS has not properly assessed the level of noise that will result from the project. Measurements were taken at places where the track is straight or in cuttings and not subject to wheel squeal or the noise of diesel locomotives on the second steepest railway grade in NSW. The number of locations (4) is inadequate. It has not truly represented the situation if the additional track is built and the number of additional trains that will run. The presentation of results is not in accordance with IGANRIP guidelines and many of the measurements fail to meet IGANRIP requirements.
2. The EIS has failed to consider the impact that noise and pollution will have on the health and wellbeing of residents. Noise from the current freight trains is heard to a disturbing level at a distance greater than 50m from the track, depending on topography. Sleep disturbance, a known health risk, is already well above the usual 1 per night for reasons other than noise. This will be added to with additional freight trains. As well the health implications from diesel particulate matter, a known carcinogen, and coal dust from uncovered wagons, a cause of severe lung disease, have not been taken into account.
3. There has been no assessment of noise mitigation measures and their effectiveness in the area of the ETTT.
4. The impact of the project on heritage and the fabric of the Beecroft Cheltenham Heritage Conservation Area ("BCHCA") through which the ETTT passes, appears to be ignored or downplayed. It is unreasonable to expect that vegetation in some properties or along the corridor will lessen the impact on heritage homes. Much of this vegetation will be cleared for the track. The indicative design for Cheltenham Station with a 13m high structure, bus bays and taxi rank, shows no regard for the heritage of this area. Parking at this already accessible station will be further away, making access more difficult. Any design must be appropriate and sympathetic to the area.
5. There has been inadequate or no consideration of Aboriginal Heritage and known registered artefacts in the area for the proposed car park at Cheltenham.
6. The reduction of the park and the proposed removal of at least two of the historic Bunya Pines at Beecroft shows little regard for heritage. A project of this magnitude requires a full appraisal by a qualified arborist of the existing vegetation and landform along the entire rail corridor and its curtilage to ameliorate the visual impact of the proposed structures and built form. Many areas of Blue Gum High Forest will be removed. This will increase the visual impact of the ETTT.
7. The reduction in road freight claimed in the proposal is unsubstantiated. As total rail freight increases to follow that road freight will also increase to get the freight to its ultimate destination.
8. Impacts during construction have not been considered. A project of this magnitude will have great impact during construction, especially as it is in an existing busy rail corridor. Impacts on local traffic and widening of the Cheltenham Road bridge have not been considered.

In conclusion, I believe that the EIS lacks equity and integrity. It seriously downplays the impact of the ETTT to support a predetermined outcome. There has been totally inadequate assessment of noise

impacts and heritage. Assessment by a qualified Heritage Officer is needed. Similarly a qualified Arborist Report for the entire track is needed. Any changes at Cheltenham Station must be sympathetic to the heritage of the area. No cost benefit analysis has been presented to support the project.

There needs to be Government regulation of noise and pollution from these old diesel locomotives and the private operators must be required to upgrade their locomotives and rolling stock. More efficient locomotives could avoid the need for the ETTT.

This is acknowledged as a short term solution. Planning of a long term solution to both road and rail freight is needed to provide a long term solution. A Western Option road linking the M7 to the F3 could incorporate rail tracks as well taking freight out of suburban Sydney. The Hon Marla Pearlman in her study of the F3 M2 road link recommended planning for this option be started immediately. Scarce funds would be better off being allocated to this. Retrofitting into an existing rail corridor on the steepest and most curved section of the track designed in then 1890s is difficult and costly.

The disproportionate cost to the community of the impact of noise and pollution and damage to heritage and vegetation has not been considered.

The ETTT should be rejected on the grounds of noise impacts alone.

Carolyn Watt
24 The Boulevard
Cheltenham 2119

Sent from my iPad