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5 November 2012

Director - Infrastructure Projects
Epping to Thornleigh Third Track Project – SSI 5132
New South Wales Department
Of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Sir or Madam

EPPING TO THORNLEIGH THIRD TRACK PROJECT – SSI 5132

I am writing in reference to the above project and the Environmental Impact Study (EIS) displayed from Wednesday 19 September 2012 until Monday 5 November 2012. I live at and own 54 The Crescent Cheltenham.

I object to the development and construction of the above project for the following reasons:

- 1 The provision of a third track between Epping and Thornleigh (ETTT) does not provide a significant improvement in rail freight options for Sydney, New South Wales or the country. **A Band-Aid Solution.** I will elaborate on this below.
- 2 The project will have a significant and adverse affect on the quality of life of my family and me and a great monetary effect on the value of our home at the above address. **A Major Adverse Affect on Me & My Family Financially & In Quality of Life**

This affectation will continue for the life of the project and will affect all those that live at this address. Again I will elaborate below.

- 2 The EIS does not address the affect on other residents and business people along the 6km corridor. **No Impact Assessment Of or For The People.** Again I will elaborate below.

1. A Bandaid Solution

The provision of a third track between Epping and Thornleigh (ETTT) does not provide a significant improvement in rail freight options for Sydney, New South Wales or the country.

My reading of the matter is that is far better to have a double track dedicated freight line for long distance freight, or at worse a single dedicated line with well planned and regular passing loops.

The "Northern Sydney Freight Corridor Strategic Review Report" (NSFCSRR) of NSW July 2012 outlines alternatives to the ETTT all of which are rejected, due to the need to provide Sydney with freight services both in and out.

I am perplexed that this document is dated July 2012 and by September 2012 a 1,347 page EIS is prepared for the only alternative recommended in the NSFCSRR.

I would advocate that the Sydney Rail Bypass with dedicated links would eliminate the need for the four projects of the NSFC Strategy. It would also provide a real long term solution to the city's and states' rail freight issues.

This combined with a **Brisbane to Melbourne inland freight line** would provide a real long term answer for the Victoria, New South Wales, Queensland and ergo Australia. ARTC's 2010 report states that only 24.6% (599km) of this link is non-existent and its construction would reduce travel times by 7.5hours and its cost \$4.7B in 2010 dollars.

It is anticipated to be **financially viable in 2020**, just 5 years after the current line via Sydney reaches projected capacity. If either forecast is out 5 years then the inland route could ameliorate through freight capacity on the northern line.

It is clear that the NSFC strategy is a "band-aid" approach to what is a major national issue that can only benefit by the long term upgrade options mentioned above commencing now.

This has been postponed no doubt due to a lack of ANY WILL of Government citing funds as the reason to run an additional line past some of Sydney's loveliest and historic residential areas.

The current northern line has been opened since approximately 1886 126 years and it did not envisage that the increase in both passenger and freight traffic in the next 130 years would require its amplification!

This current stop gap approach being taken will not give this nation and state the rail freight capacity it needs.

Nor has government truly considered the real payback period of investing in this infrastructure. The existing line's age is demonstrative of the fact that the payback period is measured in fractions of a millennium. The Surrey Iron Railway commenced operation 210 years ago and is in part still used.

2 A Major Adverse Affect on Me & My Family

Financially & In Quality of Life

The project will have a significant and adverse affect on the quality of life of my family and me and a great monetary effect on the value of our home at the above address.

Despite the findings of the EIS with which I strongly disagree, I would argue that the ETTT will have a significant adverse affect on my family's' lifestyle, health, and net worth. This will not only be during construction which is inevitable, but also during the ongoing life of the infrastructure which will be several if not many life times.

When we purchased our property in 2002, our searches did not reveal the possibility of the ETT no state government body made us aware of the possible widening of the line. Why would we suspect anything as it had been there virtually unchanged for over 125 years. When I wrote in support of the northwest rail link proposed by Premier Iemma in 2007, to our local federal member Mr Philip Ruddock, his response indicated that he too supported the northwest rail line but we should be aware that the third track for freight was planned between Epping and Hornsby.

Had we been made aware of the ETTT we would have not have purchased our house as registered Real Property Valuer with over 30 years experience I was well aware what bringing a major piece of heavy freight infrastructure to within 15 metres of our house for which we paid over \$1,000,000.00 would do to our value. As of today's date there are 6 houses for sale on the Crescent and 2 on Sutherland Road, both streets facing the railway line. Astonishingly there are a further 12 within 800 metres.

I would ask you the Director of Infrastructure Projects would you want the area of impact of a heavy rail freight line 15m from you home? It is now 35m away

The health implications are not assessed adequately in the report as stated above the line is moving over 20 meters closer to our home, the effects of diesel particulate.

A report by Australian Institute of Occupational Hygienists Inc. Of May 2007 stated the risks in regards to Diesel Particulates as follows:-

"Risk of Health Effects

While there has been (and continues to be) debated as to the carcinogenic potential of DP, there is sufficient evidence to indicate over-exposure will give rise to irritation and potentially other non-malignant adverse health effects. The risk of lung cancer is less clear, however some statutory authorities maintain that this is probable."

The Air Quality Impact Assessment by Parsons Brinkerhoff data is taken from no closer than 50m yet the EIS clearly states that the area of impact is 15 metres from our property.

A new and revised Air Quality Impact assessment should be taken at 25 and 15metres.

3 No Impact Assessment Of or For The People

The EIS does not address the affect on other residents and business people along the 6km corridor.

In reading all 364 pages of the EIS and large parts of the various impact assessments attached, in all 1,347 pages, the word person (or its plural form PEOPLE) is mentioned just once; in the glossary page xi, where "sensitive receivers" were defined as: - *"are in general, places people use to use or reside which are sensitive to potential; noise, visual and air quality impacts, such as residential dwellings, schools and hospitals."*

In my reading of the EIS, to the best of my ability and the time available to me to read 1,340 odd pages, I have not seen any discussion on the impact on liveability for those residents opposite or near the third track. The technical papers address bio diversity, noise and vibration, visual impact, access and transport, historic and cultural issues, Aboriginal issues and air quality issues. None of these reports address liveability, affectation on the value of surrounding properties both commercial and residential.

What is liveability? I would define it as "the ability to live as most would expect in the same area of a country", to be able to sit on the front veranda and say hello to neighbours as they walk on an early summer evening to play catch with your son.

The report does recognise that it met with 2 business operators in the vicinity of Pennant Hills Station (sect 3.2.2). In light of the number of businesses at Beecroft alone that face the railway line I would put that this is very poor consultation with business owners who employ people, provide services and pay taxes.

In light of the foregoing, I would urge the Department to reject the Epping to Thornleigh third track option and to direct the National Building Programme and Transport NSW to undertake and expedite the long term upgrade options to the rail freight network using Sydney rail bypass and the Melbourne to Brisbane inland rail route.

I would like to quickly address the key points of the EIS point by point and perhaps put the human element back into an impact on the environment report where really an impact on the people report should be included!

Flora	The loss of blue gum and turpentine forest is sad but development must occur and there are reasonable stands of these trees near the proposed third rail.
Fauna	No doubt some animals both native introduced and feral will be killed by the ETTT but I do not expect this to be any worse than the current operation of the existing train line.
Construction Noise	The noise during construction will affect residents near the ETTT. Unfortunately the EIS does not mention people in the summary pages but comments on "receivers". I assume these might be people but if there are other forms of receivers near the construction site, I would be pleased to be informed further.
Operational Noise	<p>Once again, the noise issues, comments on receivers and mentions 25 residential receivers will receive noise above the IGANRIP noise trigger levels. Has the EIS addressed how many people live at these 25 receivers?</p> <p>The ETT when passing through Beecroft and Cheltenham is passing through predominantly long established residential neighbourhoods. The balance of the line is in more commercial precincts generally. Beecroft recently due to the Hornsby LEP changes will have increased density of population due to height limits being increased to 15.5 metres allowing residential flat buildings of that height being constructed in the area south of Chapman Avenue, east of Beecroft Road and west of Wongala Crescent intersecting at Beecroft Road and Wongala Crescent.</p> <p>Special consideration should be give to these areas in terms of landscaping, noise attenuation, and compensation</p>

Visual Impact	<p>The visual impact statement addresses the views more from the station towards my home at 54 The Crescent than in the opposite direction. The plans that I have witnessed within the EIS seem to show no vegetation around the new Cheltenham station and the station itself somewhat looks like an ultra modern glass podium structure sitting above the platforms themselves.</p> <p>Some photos of vegetation such as 56 The Crescent has been taken from road level making vegetation appear taller and as a more effective screen.</p> <p>The visual impact should be assessed from within the property affected by the third rail project.</p> <p>Therefore, the EIS is deficient in that it does not visit each property and look out towards where the third rail would be.</p> <p>Not undertaking this work would be negligent in properly assessing the visual impact of the ETTT.</p>
Construction Traffic	<p>I recognise that with any major project construction traffic is inevitable. However, the dust etc from the construction and the construction vehicles should be addressed in a proactive and professional manner.</p>
Access to Station Facilities and Parking During Construction	<p>Again I recognise that this would impact on residents and users of the station.</p>

<p>Justification and Conclusion</p>	<p>I greatly object to the lack of use of the words "people", "residents" and "occupants" in the EIS generally. To encapsulate the impact on people, two lines are included in the Justification and Conclusion section of the EIS</p> <p>"Operational impact but generally to be associated with noise from freight trains operating closer to nearby receivers and at increased frequency".</p> <p>Proper studies of the impact on these "receivers" at distances reflecting actual distances from the ETTT be undertaken. I would put it to the Department that the impact on people is of far more importance than the impact on fauna and flora etc.</p> <p>Nowhere in the EIS does it address the impact on people who live near this project. The project predominantly passes through residential areas. To assist the Department, I would like to point out that residential areas are where people reside.</p>
<p>What can be Done to Mitigate the Impact of the ETTT on Receivers</p>	<p>It is interesting to note that in the definition of the EIS, receivers are not mentioned, nor is the definition of people or residents. Truly saddening that any state government department manned by people, run by people, administered by people, overseeing the welfare of people within the planning regime of the state of New South Wales does not mention people.</p>

Impact on my Values	<p>The EIS for the ETTT states that “....the ETTT proposal will not have significant impact on the heritage values of any historic heritage item or area”. I completely rebuff this statement and have tried to engage either Mr Clive Lucas or Mr Howard Tanner to comment on the heritage aspects of both my house and those surrounding it in the HCA of Cheltenham.</p> <p>Due to time constraints, I have been unable to provide this and would ask that an extension be granted to me to provide this as well as an allowance being made to me to engage these people on behalf of the residents between 44 -56 The Crescent Cheltenham.</p> <p>I am a Registered Valuer and a full and open Valuation on a post completion basis should be done and those houses affected compensated</p>
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WHAT IF THE ETTT IS APPROVED?

In the points below I will try to address the issues that should be considered if my suspicion is correct and the ETTT is inevitably approved.

Amortisation of the Cost of the Project	<p>One would assume that the life of this project would be equally as long as that already proven by the current northern rail system i.e. 126 years. Therefore any suggestions made that incur any additional costs should be considered in light of the proposed life of the infrastructure. One would assume it would be at least double 126 years being 252 years.</p> <p>Therefore \$1m amortised simplistically over 252 years is \$3,968.00 each and every year. Therefore \$100m requires the sum investment of \$396,800.00 pa. Should the state and federal governments consider levying freight operators, this sum of money to make this project better?</p> <p>Based on 200,000 road movements saved in the tfNSW documents, this is approximately \$1.98 per movement pa levied against freight operators.</p>
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<p>Location and Amenity of Cheltenham Station</p>	<p>Currently the location of Cheltenham station is in an open area with easy access by both foot and wheelchair directly on to the platforms from either the Sutherland Road or The Crescent approaches.</p> <p>No doubt when the platforms were first built in the 1890's this was the easiest way to provide access to the station. In those times, access for extremely disabled people was not taken into account and the need for lifts etc was negated by locating the platforms on the outer sides of the tracks rather than like Beecroft from the inside between the tracks.</p> <p>The new proposal has an overhead concourse with an ultra modern glass façade building being the station above the two platforms with lift and stair access to the platforms.</p> <p>Whilst it is not in the gambit of the ETTT to ameliorate existing noise levels, I think it is prudent and responsible to the ETTT project to try and address anything they can to make life more bearable for the receivers (people) who live near the project.</p> <p>Currently without any technical data to support this, I can tell the Department that the automated doors with their beeping warning devices together with the announcement "stand back doors closing" is extremely loud for residents who live opposite Cheltenham station.</p>
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	<p>My solution to this provides three benefits to the ETTT project as well as significant benefits to the residents who currently live opposite the existing Cheltenham railway station.</p> <ol style="list-style-type: none"> 1. If Cheltenham Railway station was located to the north of Cheltenham Road with the southern end of the platform being below the existing bridge the northern end of the platform (if of the same length of the existing platform) would be level with the Boulevard approaching The Boulevard, the need for a large structure could be circumvented. 2. The noise associated with the operations of the station is attenuated by the cutting in which the new platforms would sit. 3. Cheltenham Girls' High School which has an enrolment of approximately 1,340 would avoid crossing three streets: Cheltenham Rd, The Crescent and The Promenade. If the northern end of the platform had a direct access across to Cheltenham Girls' High School which i believe it can do. <p>If designed with some foresight and a few extra dollars, this pedestrian bridge would go straight across into the Cheltenham Girls' High School owned by the State so that all pedestrian movements of students would not interfere with traffic and therefore the risk of anyone being run over is avoided.</p> <p>Any builder will tell you that to refurbish and to work in with existing buildings is more costly and time consuming than building a new building altogether. By relocating Cheltenham station and building an entirely new station with platforms to the north utilising the footbridge at Cheltenham Road for access, would provide the opportunity for tfNSW to build a new station without any affect on the operation of the existing station and then close the existing station and revegetate it.</p>
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Location and Amenity of Cheltenham Station	<p>With cooperation from the Department of Education Cheltenham Girls' High School could provide car parking for commuters, with a footbridge connecting the car park to the new station as I proposed. The topography of Sutherland Road at that point allows for a multi tiered car park with minimal ventilation requirement.</p>
Design of NEW Cheltenham Station	<p>If Cheltenham station is to remain where it is then to minimise the impact of residents and the heritage conservation area of Cheltenham which the EIS says is minimal but with which I wholly disagree. The design must be cognisant of its location in a designated Heritage Conservation Area. My neighbours and I purchased Federation homes in a heritage conservation for the simple reason we thought that no flats or other multi storey structures would impact upon the unique character and quality of Federation homes on large single residential blocks.</p> <p>The proposed structure of the new station is abhorrent to anyone who respects a heritage conservation area. A better solution to this in my opinion would be to create a station similar to that at Beecroft; with small, low rise buildings on the platforms with pedestrian underpass connections to them, with stair, lift and escalator access provided.</p> <p>Once again, I go back to what the amortisation plans of this project are and over what period. If this solution is more costly, then I believe the cost benefit of it far outweigh the additional cost particularly if put in perspective of the expected life of the infrastructure itself.</p>

54 The Crescent Cheltenham

In regards to my own property I comment as follows:

Historic Heritage

The report acknowledges my home of listed local significance presently.

Page 242 states we are 15m from the proposed area of impact and we **may** be impacted by a new car park a two storey station concourse and the removal of trees from the Crescent. It makes no comment on the impact of a new train line realigned 20m closer to our house.

Page 244 states that it is possible that the works will have a negative impact on the views and setting of the house. The report goes on to say (in the writer's opinion) that there will be a negative impact of views from the house, but it would impact on the overall heritage value of the item. No mention of the impact of the loss of utility as it is a heritage only report.

Page 247 of the EIS's summary document that the residual impact acceptable? And concludes it is. To the residents 54 The Crescent Cheltenham for some reason the EIS is not acceptable. As the resident, I find it unacceptable.

Visual

The report has the throwaway line that "viewers (a pseudonym for people) at this location would be mainly occupants of residential properties, who would be sensitive to potential impacts."

The EIS fails to grasp that an occupant (viewer) is possibly a home owner with a significant investment, my house passed in for \$1,750,000.00 18 months ago. Putting the value of 42-56 The Crescent at about \$15,000,000.00 a residential property is a home for an occupant.

The visual impact of a two storey concourse is significant and unfortunately the EIS only addresses this in relation to heritage items thus avoiding the impact on other people and the outlook from their front yards and windows.

In summary then the EIS is an EIS, it is a Statement on The Impact of The ETTT on the Environment, and unfortunately the impact on the people in the environment is neglected completely. The report needs to address its impact on the people who live and work near the ETTT.

The EIS in terms of some statistical analysis is deficient. The Air Quality and Noise Assessments in relation to my property do not relate to the distances to the distances in the report as being the distance from my home. In relation to Air Quality it is over 300% understated. These need to be redone by new consultants as a matter of urgency.

The Heritage report needs to be reviewed by a leading Australian Heritage Architect who is acknowledged as an expert in Federation Homes and Pre WWI Planned Subdivisions.

I welcome any feedback on my submission.

Yours Faithfully

Paul P Byrne