[redacted]

28 October 2012

Director-Infrastructure Projects
Epping to Thornleigh Third Track Project- SSI 5132
NSW Department of Planning and Infrastructure
GPO Box 39
Sydney, NSW, 2001

Dear Sir/Madam,

Please find attached my submission in response to the Environmental Impact Statement (EIS) for the Epping to Thornleigh Third Track (ETTT) Project (application number SSI 5132).

Upon reading the EIS, I have identified a number of important issues that have not been adequately addressed or overlooked in the ETTT proposal EIS. These issues will have ongoing negative impacts on the local communities surrounding the ETTT if not addressed and therefore need to be seriously considered and changes made accordingly. Wherever possible I have also provided carefully considered ideas on how some of the negative impacts of the ETTT proposal may be rectified to reduce the impacts of this project on the surrounding communities **(highlighted in bold).**

In its current form, I am therefore unable to support the ETTT proposal, however, with redesign of some important aspects, as outlined below, I believe this project could proceed with a lower level of negative impacts on neighbouring communities.

Please see the following pages for details on the issues I have addressed and ways in which redesign of certain aspects would reduce negative impacts. I request that you withhold all personal information identified in this letter from publication (including my name and address), according to the provisions stated on page 28 of the EIS. Any details regarding the nature of the issues identified and proposed solutions may be made freely available.

Yours faithfully,

[redacted]

Each issue is addressed in point-form below.

Impacts on Pennant Hills railway station

1. ***Accessibility to Pennant Hills Railway Station.***

   The ETTT proposal will have significant impacts on the accessibility of Pennant Hills Station to commuters, especially those with disabilities, prams, trolleys, bicycles, the elderly and others who can't walk up/down large flights of stairs. The EIS fails to even identify the impacts of the ETTT on accessibility to commuters who use Pennant Hills Station (see page 122-125), let alone assess/provide mitigation options. The proposal will result in what is now a level access from Yarrara Rd to Platform 2, changed to necessitate that commuters ascend a long flight of stairs up to the concourse, followed by a long flight of stairs down to Platform 2. The proposal states there will be a new lift installed immediately adjacent to Yarrara Rd, however this would still require access via the new lift from ground level up to the concourse followed by the existing down to Platform 2.

   Currently, commuters who are unable to use the stairs frequently exit Platform 2 at ground level and walk South up the footpath parallel to Platform 2 to access both the Eastern and Western sides of Pennant Hills, without the need to use any lifts. The ETTT proposal will force all commuters who are unable to use stairs to cram into the very small (and shallow) lift currently servicing Platform 2, followed by use of the new lift that will be built on the extended concourse to access the street. The existing lift on Platform 2 is of insufficient size to cope with the number of commuters who are unable to use stairs and will no longer be able to directly access the footpath. The depth and configuration of the Platform 2 lift (so that the entry and exit doors are 90 degrees to each other) is not sufficiently deep to fit many prams, wheelchairs and bicycles, nor enable an area wide enough to turn these 90 degrees to exit the lift. The size of the lift is also so small that it would take more than a few trips per train to transport all those unable to use the stairs up to the concourse, bearing in mind that there is a high proportion of elderly residents and parents with prams in the area.

   Unless the new freight track was relocated to fall in-between the two passenger lines, without platform access (discussed further below), it is essential that the lift on Platform 2 be replaced with a bigger, faster lift that is more appropriate for moving commuters who are unable to use the stairs, especially during high use-periods.

2. ***Replacement of pedestrian footbridge over railway line (to the South of Pennant Hills Railway Station).***

   The EIS outlines the replacement of the pedestrian footbridge to the South of Pennant Hills Railway Station (page 84-85). The position of the new footbridge is proposed to be immediately South of the existing footbridge, however, relocation of the bridge in this manner will place the bridge immediately in front of, and perpendicular to the concrete pillars and handrails of the existing pedestrian overpass over Pennant Hills Rd. This pedestrian footbridge over the railway line connects the Eastern and Western parts of Pennant Hills, providing the main route for

Eastern residents to access the Pennant Hills shopping area by foot and is thus a critical piece of infrastructure.

The proposed position for the new footbridge would make the pedestrian route over the railway line rather awkward, as pedestrians heading East over the bridge would find themselves walking straight into a handrail upon reaching the other side and having to make a sharp left hand turn to avoid hitting this handrail (see photograph below). Furthermore, any person wanting to continue walking from the footbridge onto the Pennant Hills Rd pedestrian overpass, following the sharp left turn, would then also need to make a 180 degree right hairpin turn in order access the road overpass. The proposed position of the new footbridge is impractical, clumsy and would impede the smooth flow of pedestrians over the railway line/Pennant Hills road and also increase the possibility of collisions between pedestrians heading in different directions due to the zigzag path that would be required. It is also particularly problematic for those in wheelchairs, with prams and trolleys, who are unlikely to have the agility required to navigate the sharp turns between the two pedestrian bridges, especially in the presence of other pedestrians.

The best solution would be instead of relocating the Pennant Hills pedestrian footbridge to the South of the existing bridge, position the new footbridge <u>North</u>, immediately adjacent to the of the existing footbridge. If this was not possible due to the slope on the Northern side, then an alternative would be to place the new footbridge in the same place as the existing footbridge. Although this would require demolition of the old footbridge before the new bridge was complete, and thus some short-term inconvenience, this would be preferable to the long-term problems associated with placing the new footbridge to the South of the exiting footbridge.

3. *Impacts of ETTT proposal on visual amenity around Pennant Hills Railway station and beyond.*

The ETTT proposal will see the loss of a significant amount of vegetation currently screening the railway line from adjacent properties, both residential and commercial, as well as public space. While the EIS acknowledges that there will be moderately negative impacts through the loss of vegetation screening, it assumes that such impacts will be sufficiently mitigated through replacement vegetation or structures (page 123). In many areas, including around Pennant Hills Railway Station and elsewhere along the railway corridor, the third track will result in destruction of the entire current vegetation screen, with insufficient space for adequate replacement screening. Such impacts are certainly not trivial, and nor should they be treated as such, as the EIS does (Section 10.3.9-10.3.11, pages 209-211). In modern busy societies, natural vegetation screens are important for community happiness and other aspects of health, such as air quality and reducing noise impacts.

Around Pennant Hills Railway Station in particular, there is little space in the current ETTT proposal for provision of a vegetation screen, with in some areas, no space at all. **If the complete design of the location of the third track was reconsidered, it would be possible to reduce the amount of space needed for the third track, allowing a greater area of vegetation screening as well as also addressing the accessibility issues outlined above. Repositioning the current tracks so that the third (freight) track is placed in the middle of the two commuter tracks would greatly increase the land available for visual screening, since no third platform would be needed, as well as allow direct access to Platform 2 at Pennant Hills and other railway stations (without the need to use stairs or lifts).** The third track will be a freight/express passenger line and will therefore not require a platform for access.

Noise impacts

4. *Noise impacts during operational phase*

The purpose of the ETTT project is to provide additional capacity for the transport of freight along the Northern railway corridor, allowing the number of freight trains to increase from 25 to more than 44 services per day. Therefore, the ETTT proposal will result in an increase in the frequency of noise pollution as well as an increase in the intensity of noise pollution, due to the closer proximity of the railway line to people in the community and the loss of vegetation screening. The EIS has predicted that with the ETTT, by 2026, 25 residential receivers will be exposed to noise levels above nighttime $LA_{eq(9hour)}$ IGANRIP trigger levels (page 186). In addition to the noise catchment areas investigated, noise from freight trains frequently travels much further (kilometres away from the railway line) and thus has a much greater impact on the wider community than acknowledged in the EIS. This is partially due to the topography of the area between Epping and Thornleigh, which not only facilitates the carrying of sound, but also necessitates freight trains to apply noisy breaks as they pass through this area, affecting thousands of people, near and far.

Despite the EIS acknowledging that residents and businesses will be exposed to unacceptable noise levels as a consequence of the ETTT proposal, it fails to provide any real guarantee that such impacts will be mitigated. **The following excerpts taken from the EIS demonstrate the lack of any real commitment to mitigate the additional noise impacts caused by the ETTT proposal. In order for the community to truly believe any noise mitigation strategies will be implemented, detail should be presented in the EIS so that these can be critically analysed by the whole community and not deferred for consideration only after the project is already approved.**

9.4 Management and mitigation measures

The following management and mitigation measures would be implemented to minimise noise and vibration impacts.

9.4.1 Detailed design

There are no management and mitigation measures proposed to be implemented during detailed design.

page 193

9.4.3 Operation

At an early stage in the development of the NSFC Program, it was identified that a range of noise mitigation strategies are likely to be required to address the potential impact of additional train movements within the NSFC project area. These strategies included local mitigation measures within specific project areas (such as noise barriers and building treatments) and corridor-wide measures such as improved maintenance and quieter rolling stock.

The management of existing noise from current rail operations (both freight and passenger trains) is not within the scope of the ETTT proposal. IGANRIP requires consideration of the additional noise generated by the ETTT proposal. Accordingly, it is recognised that many of the corridor-wide options required to mitigate potential noise impacts are outside the scope of the ETTT proposal. The implementation of these measures would require a holistic network approach and commitment from freight operators, track owners, regulators and the community.

page 198

During detailed design, the finalised operational plan should identify specific requirements for freight trains to stop at the new signal. The need for additional mitigation would also be considered during the detailed design phase once the operational plan is confirmed

page 191

Commuter impacts during construction phase

5. *Impacts of rail closedown periods.*

The EIS identifies that construction of the ETTT will result in approximately 18 railway close down periods in prior to completion of the third track (page 229). This will have a significant impact on commuters who frequently travel along the Northern line, both during weekdays and on weekends. In order to give commuters the opportunity to plan their journeys accordingly, **local residents should be notified of rail closedown periods at least 4 weeks in advance through active measures, such as the distribution of leaflets in letterboxes, rather than through notifications on websites, which many people will not read.**

Ecological impacts

6. *Impacts on endangered ecological communities and biodiversity offset strategy*

The ETTT project will result in the removal of a significant amount of Blue Gum High Forest, a critically Endangered Ecological Community protected by both the Federal EPBC Act and State TSC Act (page 160). The area of Blue Gum High Forest cleared for the ETTT project represents 6% of the total area of Blue Gum High Forest in Hornsby Shire Council, and thus will have an even greater local impact (page 160). Such an impact is not trivial and considering the rare and fragmented distribution of Blue Gum High Forest, every possible effort must me made to protect and restore this Endangered Ecological Community.

The biodiversity offset strategy proposed in the EIS fails to provide adequate compensation for the loss of 2.3ha of mature Blue Gum High Forest as a result of the ETTT proposal. It is concluded that offsite offsets are preferred; however the preferred offset site does not contain any Blue Gum High Forest. Instead, the vague biodiversity offset strategy proposed in the EIS is based on a BioBanking site present in The Hills Shire Council local government area (LGA), which would not include any Blue Gum High Forest, but instead only focus on Sydney Turpentine Ironbark Forest (page 167). Such a strategy (which also lacks detail) is inadequate from both an ecological and community perspective. Considering Blue Gum High Forest is a Critically Endangered Ecological Community, any biodiversity offset strategy to offset loss of this community should focus on a BioBanking site with Blue Gum High forest and not any other vegetation type. Furthermore, as the loss of this Blue Gum High Forest will occur in Hornsby Shire Council LGA, it is only appropriate that a suitable Blue Gum High Forest BioBanking site should be found within Hornsby Shire Council LGA and not in any other LGA.

A partnership should be formed with Hornsby Shire Council environmental staff to determine a suitable location within Hornsby Shire Council for offsetting both the Blue Gum High Forest and Sydney Turpentine Ironbark Forest losses as a consequence of the ETTT project. Significantly more detail about the biodiversity offset strategy should be provided in the EIS so that it can be assessed by the public before project approval.

Concluding remarks

This submission contains a number of issues that have not been adequately addressed in the ETTT proposal EIS. It also includes a number of solutions and recommendations **(in bold)**, which, if implemented would limit many of the negative impacts of the ETTT on the affected communities. In addition, the EIS indicates a fourth freight track on the Northern line is also planned for the future- which undoubtedly will have an even greater and cumulative impact along with the ETTT. This submission has been made as a part of the Exhibition, Consultation and Review phase of the project approval process. True community consultation is not simply informing the community of what will happen, but listening to ALL of their concerns and alternative suggestions and incorporating this feedback into the project. I sincerely hope that this exercise is not merely to 'tick all the boxes' and that genuine community consultation and involvement in the final design of the project will occur. After all, it is the local community that will have to live with the impacts of this project and their voice deserves not just to be heard, but also to be acted upon.