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14 December 2010

Maldon to Dombarton Rail Link Feasibility Study
National Building Infrastructure Investment Division
Department of Infrastructure and Transport
GPO Box 594
CANBERRA ACT 2601

Submission re: Maldon to Dombarton Rail Link Feasibility Study – Issues Paper 2010

This submission is lodged as an objection to the proposal to complete the Maldon to Dombarton Rail Link and addresses a number of matters but principally relates to the adverse effect that increased rail traffic directed onto the Moss Vale line will have upon our property and the residential areas of Farmborough Heights and Unanderra.

The key issues and questions in the Paper address the circumstances surrounding the demand, capacity, environmental and heritage and cost-benefit issues of the actual Rail Link but do not fully encompass the eventual flow-on effect upon the residential areas in proximity to the existing rail corridor between Dombarton and Unanderra.

Comments to assist the Consultants with the Study:

Paragraph Comment

4.1 Coal:
A major increase in coal train traffic will no doubt result in an increase in air pollution from wind-blown coal dust and an increase in noise nuisance and pollution from diesel fume.

4.1.2 The only mines in the southern coalfield which are likely to consider the transport of their product via Maldon-Dombarton are Westcliff, Appin and Tahmor.

It would appear to be counter productive to bring coal from the western coalfields to Port Kembla through the Maldon to Dombarton link unless a further freight-specific rail link was constructed from the west of Flemington Junction directly to Maldon in order to relieve the constraints of the Metropolitan Freight Network.

4.2 & 5.1 Grain:
As with the transport of coal, it would be impractical to encourage any further sources of grain to Port Kembla from the north or west of the State to be conveyed via Maldon without the construction of a freight-specific rail link from Meeks Road / Flemington Junction to Maldon.

5.1

Rail Capacity & Network Constraints:

A greater benefit/cost ratio could be achieved by re-allocating Maldon/Dombarton funding to extensive upgrading of the Illawarra line, the construction of an additional freight-specific line and/or more frequent and longer passing loops to be used in conjunction with and to relieve pressure on that existing Illawarra line.

Such upgrading should include, among many other things, the reconstruction or by-passing of the existing Stanwell Park viaduct.

There are further issues associated with increased future use of the Moss Vale line as detailed in the following comments.

6& 8

Environmental Issues / Other Issues

Apart from the environmental issues of noise, vibration and air pollution associated with construction and use of the Maldon to Dombarton Link line, the flow-on effect associated with the expected increased use of the Moss Vale line is of extreme concern.

Our dwelling at 9 Bristol Parade Farmborough Heights is located adjacent to the Moss Vale line and is one of at least 370 residential dwellings in the Farmborough Heights / Unanderra area which will be adversely affected by any increased heavy freight usage of that line.

Completion of electrification of the line should be addressed but does not appear to be a consideration for the Study at this stage. As was outlined in the State Rail Authority EIA report of 1983 "the SRA will maximise the use of diesel-electric locomotives" and unfortunately this appears to be the current attitude.

Many measures which were supposedly incorporated into the design of the duplication of the Moss Vale line in 1983 have basically been ineffective in ameliorating the adverse effects from noise and air pollution.

Noise.

Undertakings by the SRA at the time to address brake squeal by various means including appropriate driver training have been largely ineffective. Frequently a continuous disturbing and distressing squeal of brakes occurs throughout the entire length of descent from the escarpment through Farmborough Heights to the Princes Highway road crossing.

The SRA at the time undertook to train drivers to minimise application of air braking and to maximise the use of locomotive braking on the descent, to minimise environmental noise effects, however this procedure appears not to be followed by many drivers.

Further to this, there are frequent occurrences where it is obvious that the air brakes have not been completely disengaged even on the ascending journey, resulting in intermittent and sometimes long periods of brake squeal during the ascent.

The nature of engine and brake squeal noise varies from train to train, obviously as a result of different locomotives and rolling stock, and the ability and/or care of the respective drivers.

Whether the Maldon/Dombarton Link proceeds or not, the matter of unwarranted brake squeal needs to be urgently addressed.

There appears to be a need to upgrade much of the rolling stock and braking systems and to review driver training, particularly in view of the steep grades existing along the Moss Vale line.

Air Pollution.

The matter of pollution from diesel fumes is of serious concern at the present time not only in respect of odour but because of lodgement of particulate matter on houses adjoining the rail line, causing a dark greasy film on painted surfaces.

Should rail traffic be increased on the Moss Vale line with a greater number of diesel electric locomotives, diesel fume and pollution from wind blown coal dust will have a dramatic effect upon air quality in residential areas.

Comments on EIS Report of December 1983.

Attached for information and for consideration by the Consultants is a copy of my submission made on 28 October 1983 in respect of the previous proposal. Many of those comments remain valid today in respect of the current proposal to complete the Maldon to Dombarton sector of the scheme.

Yours faithfully,


J M Waples.

J M Waples
9 Bristol Parade
FARMBOROUGH HEIGHTS NSW 2526

28 October 1983

State Rail Authority of NSW
Maldon-Dombarton-Port Kembla
Railway Project Manager
Room 507 Transport House
11-31 York Street
SYDNEY NSW 2000

Dear Sir

ENVIRONMENTAL IMPACT STATEMENT
MALDON-DOBARTON-PORT KEMBLA RAILWAY

I have carefully perused the full four volumes of the above Statement and lodge herewith my comment and give notice of my total opposition to the proposal.

I have resided at Bristol Parade, Farmborough Heights, for a total period of twelve years and fully recognised the existence of the Moss Vale Railway and the possibility of some increase in usage of that single line over a period of time. The proposal which is now set out in the EIS is a development of a totally different concept to the existing Railway and envisages the imposition of heavy industry type activity upon a residential area.

It is quite obvious that although some investigation has been made of alternative coal transportation systems, the feasibility studies and cost benefit analyses of these possibilities, have not been fully recognised and undue weight has been given to the Maldon-Dombarton-Port Kembla proposal.

It is equally obvious that, regardless of any comments which may be made by affected and/or interested parties, the decision has been made to construct the line and a commencement date has been fixed.

It will remain to be seen if the recruitment of local labour will fully eventuate (this is the apparent given reason for an early start) and it will also remain to be seen whether the entire project, including electrification and promised bridges together with environmental safeguards can be completed for the estimated \$160 million or whether it will extend to \$320 million.

State Rail Authority of NSW
28 October 1983

The environmental impact statement sets out information on the relevant aspects of construction and use, however, it does not satisfactorily answer the questions of what will be the real effects on the residents of adversely affected areas. What will be the real effects, physically, psychologically and visually, and eventually, if the project is completed, what recourse will residents have for rectification if the effects are really adverse and a number of residents are able to prove that they are in fact adversely affected?

The following comments are set out in support of my contention that the proposed railway construction should not proceed. I submit that the far more environmentally acceptable proposal of an underground conveyor system with an underground bunker feed system west of the escarpment should be pursued for the transport of coal to the Port Kembla coal loader.

- * It is considered that there are a minimum number of 210 residential dwellings in the Unanderra/Farmborough Heights area which will be directly and adversely affected by noise, vibration and dust to a greater degree over longer and far more frequent periods than they are at the present time.

Beyond the immediate proximity zone to the railway line, there will be an additional number of residential dwellings of at least 160 which are most likely to be adversely affected. Therefore, a total number of 370 dwellings in the Farmborough Heights/Unanderra area will most likely be adversely affected. In addition, there will be a further number of houses in the O'Donnell Drive, Figtree area, and at Mt St. Thomas which are very likely to be similarly affected.

- * The existing line is a single track on which an average of 4-8 trains travel daily (EIS Vol II Page 36), however, the noise amelioration treatment has been based on the proposed maximum number of 54 movements per day (EIS Vol IV Page 44). This obviously represents a multiplication of the existing usage by approximately four. It also represents at least twice the maximum possible usage of the existing single line.

- * The entire line system from Maldon to Port Kembla is proposed to be electrified and yet of the peak of 54 movements per day, 36 coal trains will be hauled by 86 class electric locomotives whilst a maximum of 18 coal trains would be hauled by 81 class (or equal) diesel electric locomotives (EIS Vol IV Page 44). This represents at least two and almost three times the number of diesel electric locomotives currently operating on the line, excluding the fully electric locomotives. With the proposed number of 31 x 100 tonne cars on each train the return trip to Maldon up the 1:30 grade will obviously require two locomotives. If any backloading or additional cars or freight are added, then (see EIS Vol II Page 17 Clause 5.7.2) three locomotives may frequently be used which produce sound in the 92 dB(A) range. This would be a most dramatic effect in an area such as at Farmborough Heights where equivalent night time noise levels are as low as 35 dB(A) (EIS Vol IV Page 48).

- * Notwithstanding the above dramatic likely increases in sound levels and increases in number of train movements, "the SRA has stated that they do not intend to install an acoustical wayside Barrier System, nor do they intend to undertake modifications to Diesel electric locomotives (EIS Vol IV Page 54).

- * In a report by Gutteridge Haskins & Davey Pty Ltd titled "A Planning Framework for the Accommodation of Coal Development by Wollongong City", (Stage 2) Page 42 refers:

"The Maldon-Dombarton-Port Kembla rail link would haul a large proportion of coal from the western districts and the area west of Wollongong. As there are fewer residents on the Dombarton-Port Kembla section of line than on the Illawarra line, this scenario would have less of a noise impact from rail haulage on Wollongong residents than other scenarios.

"This is also the only scenario in which western district coal has the potential to bypass the built-up area of Sydney, mitigating potential ADVERSE ENVIRONMENTAL IMPACTS FROM COAL HAULAGE FOR A LARGE POPULATION. THE IMPACT OF COAL TRANSPORTATION ON THE RESIDENTS ON THE DOMBARTON-PORT KEMBLA SECTION OF THE MALDON-DOMBARTON-PORT KEMBLA LINE WOULD, HOWEVER, BE HIGHLY SIGNIFICANT."

- * A general statement by Gutteridge Haskins & Davey Pty Ltd in the same report (Page 45) advises that "The haulage of coal through the City of Wollongong has been an historic and integral part of that City's development. This development, however, has not been without some cost - namely, A LOSS OF ENVIRONMENTAL QUALITY ALONG THE HAULAGE ROUTES" - It would seem from the patent lack of foresight evident in the Environmental Impact Statement on the Maldon-Dombarton-Port Kembla Railway that the SRA intends to perpetuate and to accelerate the abovementioned "LOSS OF ENVIRONMENTAL QUALITY".
- * (EIS Vol II Clause 7.3 Page 42) refers to "minor contributitons of Diesel exhaust to the environment but no expected adverse air quality impacts". This obviously confirms an expected increase in Diesel electric locomotives, and it is also equally obvious from the statements, that the consultants did not investigate the greasy film adhering to windows and doors of residences immediately adjoining the railway. An increase in the deposition of this material from Diesel exhausts of additional locomotives will have a further adverse effect.
- * (EIS Vol II Clause 7.3 Page 42) refers "In particular, monitoring programmes show no evidence of adverse effects due to coal dust in areas where coal trains are presently used. No adverse effects are expected along this section of the line from railway operations".

(EIS Vol I Clause 7.5 Page 62) also refers to "monitoring programmes have been undertaken which demonstrate that coal trains do not result in degradation of local air quality" and also "coal moisture content (of the coal) is kept high to minimise dust generation at any stage in the handling and transport" - When the distance of travel of coal trains from western fields is taken into consideration, the surface coal on rail trucks will be extremely dry by the time each train reaches the Farmborough Heights/Unanderra area and wind turbulence, particularly in cuttings and near embankments, must cause localised air pollution. This was in evidence during the trial period of travelling coal trains on the Moss Vale line during recent modifications to the Illawarra Line north of Scarborough. Films of coal dust were in evidence on door steps and window sills of residences adjacent to the Moss Vale line, and it is quite apparent that appropriate monitoring of the dust effects have not yet been done (Note - The EIS for the Port Kembla Coal Loader also stated that there would be little adverse effect on Wollongong from wind-blown coal dust from the stockpiles - this assurance has not been kept).

Yours faithfully
J. M. S. P. O.