SUBMISSION BY THE RAIL, TRAM AND BUS UNION (QLD BRANCH)

TO

THE COORDINATOR-GENERAL

Project Manager - Cross River Rail

DEPARTMENT OF STATE DEVELOPMENT, INFRASTRUCTURE AND PLANNING

ENVIRONMENTAL IMPACT STATEMENT SUPPLEMENTARY REPORT FOR THE CROSS RIVER RAIL PROJECT

AUGUST 2012

Introduction

The Australian Rail, Tram and Bus Industry Union (RTBU) acknowledge the Coordinator Generals Environmental Impact Statement Supplementary Report (EISSR) for the Cross River Rail Project (CRR).

The RTBU is a federally registered union of employees with a membership of 35,000 of which approximately 5,000 are in South-East Queensland. The RTBU has members employed in the provision of:

- Passenger bus & rail
- Freight rail
- Rail services, Infrastructure and maintenance

RTBU members perform a range of functions including operations, maintenance and administration. As the representative union of employees in passenger and freight rail transport, the RTBU maintains a vital interest in promoting the social and economic importance of rail infrastructure to the public.

In particular, RTBU members and officials have consistently contributed to debate on matters such as urban planning, efficient passenger and freight transit, energy use, reducing greenhouse gas emissions and social justice.

This supplementary submission is part of an important and ongoing community discussion about the many dimensions of urban passenger rail and rail freight transport.

The RTBU firmly believes that the community and economic impacts of – effective and efficient transport networks; safe and viable transport services; and environmentally sustainable transport infrastructure – need to be comprehensively covered by the CRR project.

This supplementary submission will identify a number of weaknesses in the CRR project.

In light of the RTBU's unique understanding of rail industry operational and technical issues, we are willing to accommodate any request for further input as the CRR project proceeds.

The RTBU would also be grateful for the opportunity to be involved with any formal advisory bodies that may provide ongoing advice on planning, implementation, operational and/or technical issues in the future concerning the CRR project.

For further information about any matter contained in this submission, please do not hesitate to contact me on (07) 3839 4988 or Email owen.doogan@rtbu.com.au.

Yours sincerely

Owen Doogan
State Secretary
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General Comments regarding the Cross River Rail Environmental Impact Statement Supplementary Report (EISSR) March 2012

The RTBU recognises the importance of the Cross River Rail project to the State, in particular in facilitating improvement in rail public transport in South-East Queensland (SEQ) through the provision of additional capacity to cater for the growth in demand for passenger rail services in SEQ.

The RTBU does not believe that the Cross River Rail tunnels by themselves will solve the SEQ rail capacity constraints going forward.

The RTBU notes that some selected excerpts of our submission to the Cross River Rail Draft EIS in October 2011 are contained within the Summary of Submissions in the CRR EISSR as respondent number 72.

The RTBU reaffirms all of our suggestions and concerns made in our CRR Draft EIS submission in October 2011.

The RTBU notes the "Proponent Response December 2011" to the published comments in response to our suggestions and concerns. However, these responses do not satisfy the RTBU's concerns. In the view of the RTBU, it appears that the Proponent has adopted a myopic and insular approach to many suggestions by respondents, including the RTBU's.

Whilst the CRR project releases and improves capacity in the inner city area, it also potentially moves the key points of constraint to the north (Exhibition to Northgate) and to the south (Yeerongpilly to Salisbury). This will ultimately result in additional capacity constraints and produce a sub-optimal outcome. The CRR project currently appears to be planning through the prism of a 20-year timeframe. In order to avoid future capacity constraints, the planning timeframe should be expanded to consider rail investment needs over the next century.

The CRR is a transformational and intergenerational project that has the potential to enhance significantly the SEQ rail network over the long term.

Additional enabling infrastructure that deals with capacity constraints and the ability to grow the rail task in South-East Queensland in the long-term should be part of the CRR project assessment process.

The RTBU recommends that the Coordinator General take a strategic view of the project and move beyond the normal and narrow EIS focus of the project boundaries. The Coordinator General should take a long term, potentially 100 year, approach to this important nation-building project.

The RTBU further recommends that the CRR project should look beyond addressing the current inner city narrow gauge capacity constraints. The scope of the project should be broadened to at least consider other SEQ network optimisation opportunities.

The RTBU previously highlighted the potential for the adverse effects of construction of Cross River Rail to negatively impact on the reliability of rail freight services, which share the South-East Queensland rail network with passenger rail services, particularly at the southern and northern portals and some station works, which are located on critical rail freight corridors.

The importance of rail freight to the economy of Queensland and the importance of reliability to the end users of rail freight services and the people of northern Queensland serviced by rail freight were

also highlighted by the RTBU. The RTBU in this response further emphasises the importance of rail freight in the section titled "Construction Impacts on Rail Freight".

The Challenges Associated with the CRR Project

In this section, the RTBU will highlight some of the challenges associated with the CRR Project that the RTBU believes needs to be addressed.

The RTBU is concerned about the incremental and minimalist approach to investment in rail infrastructure in Australia. Decisions about corridor preservation and property acquisition for rail projects are based on the initial short-term requirement of the project under consideration, rather than preserving enough corridor land for long-term requirements. This approach should change.

The CRR project is a unique opportunity to enable the development of a high frequency and high-capacity rail network in South-East Queensland. It is therefore vital that a strategic approach is adopted, rather than the current focus on short-term cost savings. The RTBU proposes that the Coordinator General take a strategic view of the project and its potential intergenerational contribution by considering a 100 year approach to assessing the benefits of this important nation building project. Therefore, the RTBU considers that additional enabling infrastructure that deals with capacity constraints to the northern and southern approaches of the tunnel portals and the ability to grow the rail task in South-East Queensland should be part of the CRR project assessment process.

It is noted that on a number of occasions the Proponent dismissed suggestions with a response about the "costs associated with" adoption. Whilst the RTBU recognises that cost is an important consideration, the long-term and intergenerational benefit of adopting some of the suggestions would outweigh the short-term cost considerations. As an example, adopting a longer-term view allows planning and development to occur around the "final state" footprints, rather than causing future disruption to communities that have developed around a transitional short-term footprint. Otherwise if development is allowed to occur on the "final state" footprints the ability to optimise the initial project and investment would be seriously compromised.

The CRR will deliver an asset with a life of over 100 years. As such, a similar timeframe needs to be considered when assessing the costs and the benefits of this important nation-building project.

Construction activity at the northern and southern surface "tie-in" points, where the project interfaces with the existing network will create a situation where the intended capacity increases that this project is designed to encourage will be limited during the construction phase. This will be a consequence of acquiring insufficient property "footprint" to allow "off-line" construction activity to occur.

The minimalist property footprint approach that is being taken by the CRR project at the south and north tie-in points for surface works is short-sighted. This approach will cause significant disruption to freight and passenger services whilst construction occurs. Whilst a minimalist approach to property acquisition may initially appear to save costs, the trade off with disruption to existing freight and passenger services may well result in greater overall costs and risks in the long-term.

Additional network enhancements should be considered to improve the capacity delivered by the project in the medium and long-term, rather than having a narrow focus on the Cross River Rail tunnel in isolation.

Without the provision of additional surface track infrastructure, the significant investment in the CRR tunnels will be unable to deliver their potential throughput capacity at inception. This will result in a suboptimal outcome with lost opportunities and will lead to future costs that could have been avoided by making provision for the "final state" requirements. The result of adopting this short term and limited view will almost certainly be the need for further significant infrastructure investment to the north and south of the tunnel portals to deliver the capacity potential of the tunnels.

Construction Impacts on Rail Freight

The southern and northern surface approaches and exits to the CRR tunnels are located on critical corridors where freight and passenger trains converge/cross on a shared section of track within the SEQ metropolitan network.

It appears to the RTBU that the Coordinator General and the Proponent do not properly understand the adverse impacts of a prolonged construction phase and post construction effects on rail freight services. There also does not seem to be an understanding of how rail freight works and the important role and contribution that rail freight plays in the economy of Queensland, in addition to the direct revenue contribution of freight access charges to the ongoing funding of the rail network.

Our perception is based on the Proponent's suggested mitigation treatments of; "interface agreement, consultation and use of Queensland Rail's Scheduled Closure Access System to minimise impact and would avoid peak times. Generally such works occur at night (after the last passenger service) or at weekends. Longer shutdowns may occur over long weekends such as at Christmas or Easter to enable complex work to be undertaken. Consultation and management arrangements for the necessary rail corridor possessions during detailed design phase."

It should be noted by the Coordinator General and the Proponent that rail freight movements occur outside of peak commuter periods, primarily at night and on weekends, to avoid congestion and associated delays and to meet the demands of end users for delivery of product to North Queensland. It appears that these are the very times that construction activity is proposed to occur, which may minimise impact on passenger rail but will maximise impact on rail freight.

The intermodal/general freight supply chain cycle times are time sensitive and reliability is of primary importance to rail operators and their customers. Any disruption can have adverse impacts on train consist cycles and reliability. Any extended period of prolonged closure, that is on weekends over months or years for major construction and during the off-peak periods when major rail freight movements occur, will create a negative perception of the reliability of rail freight and potentially permanently impact modal share and rail operator's business. Freight lost to road under these circumstances may never return to rail. This is of major concern to the RTBU and our members.

It is important that construction and staging is designed in such a way that it causes minimal disruption to existing services, otherwise displacement of services during a prolonged construction period could result in modal shift from public transport to private vehicles and rail freight modal shift onto the road network. Such a course of events would be counterproductive to what is trying to be achieved with the CRR project.

Should excessive construction activity cause delays and disruption resulting in modal transfer, likely impacts would include increased fuel consumption, increased greenhouse gas emissions, road network congestion, and community concerns. This is of concern to the RTBU and our members.

In the view of the RTBU, attempting to address these challenging issues with discussion and consultation at the detailed design phase may be too late to adequately mitigate against the potentially damaging impacts of prolonged construction related closures over an estimated five year period. This would particularly be the case if insufficient spatial property allowance is made to facilitate "off-line" construction activities to occur.

As previously advised, without acquisition of sufficient property to allow "off-line" construction activity, there is a significant risk that corridor closures for construction activities during the off-peak periods will negatively impact rail freight services.

To maintain services and safe separation during the CRR construction phase, additional land on key corridors should be acquired for construction of additional tracks.

The current QR Scheduled Closure Access System (SCAS) is an approach to maintenance that is most suited to passenger only corridors however the northern and southern approach corridors are both passenger and freight corridors. Passenger rail services can be provided with an acceptable alternative with the substitution of bus services on lower demand weekends or nights while construction or maintenance closures occur. This option is not available to rail freight customers or operators, with any prolonged closures requiring freight to be carried by road.

Given the rail operators business requirements and in turn their customers who operate on a "Just In Time" basis for deliveries to far North Queensland (e.g. Coles, Woolworths & IGA), lack of reliability is an important issue that needs to be addressed.

Given the importance of rail freight, the RTBU suggests that the Proponent and the Coordinator General give greater recognition to the significance of rail freight by conditioning the project construction activities to ensure that there is no disadvantage to the movement of freight trains as a result of the CRR project.

Contemporary CRR issues

The RTBU recognises that circumstances have changed since the CRR Draft EIS was produced and that in June 2012 an expert panel was appointed by the Queensland Government to review the Cross River Rail project. The RTBU notes the recommendation of the expert panel that the Queensland Government proceed with a scaled-back version of the original CRR project. This involves proceeding only with the twin 10 kilometres underground tunnels from Yeerongpilly to Victoria Park. The previously recommended CRR surface works are now to be removed from the scope of works for the initial stage of the revised CRR project delivery.

The freight implications of the revised CRR project will include freight train capacity challenges between Salisbury and the Yeerongpilly/Tennyson junction unless the previously proposed surface track work is undertaken, particularly the dedicated dual gauge freight line from the Acacia Ridge intermodal freight terminal to the Port of Brisbane.

The RTBU notes that the deferral of the surface track work for the revised CRR project presents a number of dilemmas for rail freight capacity and reliability. It is noted that the initial disruption from the prolonged surface construction period associated with the original CRR project scope will now be deferred. However, the increased number of passenger services that will be induced through the provision of the CRR tunnels will create significant operational constraints, as well as creating limitations for freight services near the southern and northern surface approaches.

The southern and northern surface approaches to the CRR tunnels are on critical corridors where freight and passenger trains converge/cross on shared sections of track within the SEQ metropolitan network.

Whilst the CRR project tunnels improve capacity in the inner city area, it also moves the key points of constraint to the northern and southern approaches to the tunnel portals, to the north (Exhibition to Northgate) and to the south (Yeerongpilly to Salisbury). This will ultimately result in additional capacity constraints and produce a sub optimal outcome. The CRR project currently appears to be planning through the prism of a 20-year timeframe. In order to avoid future capacity issues, a strategic approach should be taken with the planning timeframe expanded to consider rail investment needs over the next 100 years.

Without the provision of additional surface track infrastructure at the northern and southern approaches of the tunnel portals, the significant investment in the CRR tunnels will be unable to deliver their potential throughput capacity at inception. This will result in a suboptimal outcome with lost opportunities and will lead to future costs that could have been avoided by making provision for the “final state” requirements. The result of adopting this short term and limited view will almost certainly be the need for further significant infrastructure investment to the north and south of the tunnel portals.

It is the view of the RTBU that the CRR Project must address these issues early and make adequate provision for future enhancements to deliver maximum value from the significant investment in the CRR tunnels. At the very least, acquisition or preservation of sufficient property requirements should occur to provide for future network enhancements to deliver the CRR project throughput capacity that will ultimately be required going forward.