



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

TO

THE COORDINATOR-GENERAL

The Bus and Train Project (BaT) Project

DEPARTMENT OF STATE DEVELOPMENT, INFRASTRUCTURE AND PLANNING

ENVIRONMENTAL IMPACT STATEMENT REPORT FOR

THE UNDERGROUND BUS AND TRAIN PROJECT (BaT Project)

OCTOBER 2014

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Introduction

The Australian Rail, Tram and Bus Industry Union (RTBU) acknowledge the Coordinator Generals Environmental Impact Statement for the Bus and Train Project (BaT).

The RTBU welcomes any new and appropriate investment in rail and bus infrastructure in SEQ as it is recognised that current public transport infrastructure is not able to cater for anticipated population growth in SEQ.

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 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 BaT project.

This submission will identify a number of apparent weaknesses in the BaT project.

In light of the RTBU's unique understanding of the bus and rail industry operational and technical issues, we are willing to accommodate any request for further input as the BaT 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 enhancing the BaT 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
Qld Branch

General comments regarding the Bus and Train Project Environmental Impact Statement Report

The RTBU welcomes appropriate investment in rail and bus infrastructure in SEQ as it is recognised that current public transport infrastructure is not able to cater for anticipated population growth in SEQ.

For this reason RTBU was a strong supporter of the Cross River Rail (CRR) project proceeding.

The CRR project was the result of a robust and detailed examination of all the factors over several years evolving from the earlier Inner City Rail Capacity Study (ICRCS) to determine the best rail transport outcome for future passenger rail demand in SEQ.

Accordingly CRR was ranked number one of projects ready to proceed by Infrastructure Australia.

It is noted by the RTBU that the BaT Project is driven by a political imperative to differentiate the project from the previous governments CRR project. This is flawed approach to transport and land use planning with the scope of the project driven by political motives, rather than achieving the best transport and land use outcome.

A project of this magnitude should not be rushed to meet political directives, as it is a project that will have a practical asset life of over 100 years. Given that many governments will come and go in the next 100 years such a project should be beyond political interference or directives. A project reference design criterion of avoiding any residential property acquisitions is very constraining in achieving the optimum transport and land use outcomes. Such an approach is highly flawed and does not apply when road projects are considered. Government and its agencies should be beyond adopting infrastructure solutions to meet short-term political objectives.

It is clear that the BaT proposal which result in 5 rail tracks (3 existing surface and the 2 BaT Tunnel tracks), merging into 3 surface tracks from south of Dutton Park through to Salisbury will constrain the efficiency and capacity at inception, this is a highly flawed operational strategy. Such a short-term approach of building in constraints at inception is flawed. The project also appears to fail to set out how future increased throughput capacity or frequency of services will occur in the longer-term.

These fundamental constrains and contradictions are highlighted by the EIS Technical Report 1 Transport in Figure 3-8 (p70) which acknowledges and highlights existing rail capacity constraints. It appears the narrow scope and approach to dealing with rail capacity constrains with the BaT project, which continues to imbed such capacity constraints and fails to address obviously known rail infrastructure capacity constraints to efficient operations.

The RTBU's is disappointed that the previous CRR proposal is not going to proceed due to a desire to reduce the scope, cost and meet a political objectives. Notwithstanding this, the RTBU welcomes investment any new investment in rail and bus infrastructure in SEQ but with reservations relating to

the current proposal which are highlighted in this submission.

It is our view that if the BaT Project is to proceed, it needs to make provisions consistent with the future rail capacity throughput that was to be provided by CRR.

It appears based on the information in the EIS report the BaT Project Tunnel does not provide anywhere near the same degree of capacity and future proofing that CRR provided.

This is of serious concern to us and we would suggest this should be addressed.

The RTBU supports investment in public transport infrastructure to provide the capacity needed to cater for the expected strong growth of public transport movements associated with continuing population growth in SEQ. However, the limitations outlined in this submission should be addressed for the sake of the current taxpayers who are being asked to fund a project that is not delivering the rail outcomes that it should, and it will be future taxpayers who will be required to fix the deficiencies of the BaT Project. The RTBU further emphasises the importance of wise use of public funds in the section titled "Responsibility for wise use of Public Funds".

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

The RTBU does not however believe that the Bus and Train tunnels by themselves will solve the SEQ bus and rail capacity constraints going forward.

The RTBU reaffirms all of our suggestions and concerns made in our BaT reference design submission in April 2014.

Whilst the BaT project to some extent releases and improves some rail 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 (Dutton Park to Salisbury). This will ultimately result in additional capacity constraints and produce sub-optimal transport outcomes. At an operational level the BaT project currently appears to be planning through the prism of a 10-20-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 BaT is potentially a transformational and intergenerational project that has the potential to enhance the SEQ rail and bus 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 BaT project outcome.

The RTBU recommends that the Coordinator General take a strategic view of the project and move beyond the BaT 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 BaT project scope should look beyond addressing the current inner city rail narrow gauge capacity constraints. The scope of the project should be broadened to at least consider other SEQ rail and bus network optimisation opportunities.

The RTBU previously highlighted the potential for the adverse effects of construction phase of Bus and Train Project 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 southern 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 is an issue 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".

Responsibility for wise use of Public Funds

Public transport projects of the scale of those recently proposed, whether a rail tunnel (as proposed under CRR), a bus tunnel as proposed under Suburbs 2 City, or a combined rail and bus tunnel as proposed as the BaT Tunnel Project (the Project) represent a massive/enormous commitment of public funds. Those entrusted with the wise spending of public funds must ensure that these projects don't just meet today's requirements. They must also ensure a substantial level of future proofing is provided including spare capacity and also expansion options to allow for future growth.

There must also be a strong emphasis on providing "value" over the asset life for the investment in public funds required. A short term focus on cost containment, while reducing the investment required now can require future generations to fund expansions of the project at many times current costs, this may require future disruptions on busier networks or may also constrain the fundamental project boundaries so that logical expansions can never be built.

This is particularly important for tunnel projects where expansion of the tunnel dimensions is not possible, subsequent expansions of facilities such as underground stations is impractical and prohibitive expansion of the project boundaries at a later time will be difficult, costly and disruptive.

It is noted that in the EIS **Chapter 14 Socio-economic assessment** the reference to Cost benefit analysis (14-46- 48):

Table 14-14 Economic evaluation inputs and assumptions

Item Cost - Input/assumption

Project costs include capital construction costs, annual operating costs and all ongoing maintenance costs on a whole-of-life basis.

Construction and operation costs included in the economic evaluation for the Project include:

- fixed infrastructure costs, including early and enabling works, tunnel, stations, rail track and other surface infrastructure*
- systems infrastructure, including busway systems, rail signalling and rail power*
- construction and operational risk*
- Principal's costs (including additional rollingstock requirements) and property acquisition costs*
- recurrent costs, such as bus and train running costs and station operation costs.*

The total whole of life cost for the Project is estimated to be \$4.09 billion (in 2014 values), including allowance for Project risk.

Based on the RTBU's rail industry experience and understanding of the costs included in the BaT

assumptions the RTBU finds this project cost estimate very questionable, even heroic with what appears to be substantial optimism bias in understating the likely cost. In the absence of a detailed breakdown of how the cost estimates were calculated is of concern and appears to be created for the purpose of a political announcement rather than a realistic cost. If this important data proves to subsequently be too optimistic for the BaT project, the taxpayers and future Governments will carry the risks of overrun in the project costs, with what appears to be very limited benefit compared to the CRR project.

Provision for growth on the rail corridor south of Dutton Park

It is noted that the Project EIS provides only a basic concept alignment with little detail as to the operational strategy. The EIS does not provide important information on throughput capacity or frequency of services or longer-term performance characteristics and capability.

From the limited information contained in the EIS and our knowledge of the CRR project. The analysis of demand growth and rail network configurations and constraints that underpinned the solution to demand growth as well as capacity that CRR represented, it appears that the BaT Project does not provide anywhere near the same level of capacity and future proofing that CRR provided. It also appears that relying only on the limited surface rail tracks of the existing network, particularly south of Dutton Park to Salisbury this will limit any potential increased inner-city rail capacity to be provided by the BaT Project.

Unless the Project makes an allowance for a 10-20 year plus capacity solution, this investment in enhancement of rail network capacity may reasonably be perceived as not a good use of taxpayer's funds.

The community reaction to the impacts of additional surface tracks between Dutton Park and Yeerongpilly and a desire to avoid this constrained section resulted in the CRR tunnel being extended to Yeerongpilly.

This change minimised the potentially substantial property and community impacts on the suburbs of Fairfield, Annerley, Yeronga and Yeerongpilly.

The dual tracks of the rail component of the Project, as indicated in the reference design diagrams will join the existing network where there are currently only 3 tracks.

It is clear that the BaT proposal which result in 5 rail tracks (3 existing surface and the 2 BaT Tunnel tracks), merging into 3 surface tracks from south of Dutton Park through to Salisbury will constrain the efficiency and capacity at inception, this is a highly flawed operational strategy. The convergence

of 5 tracks into the 3 tracks will result in competition for available capacity on the existing network tracks south of the existing Dutton Park Station, a section of the network which is already severely constrained nearing its capacity.

This may result in new rail network capacity constraints that will need to be addressed in the future if the Project is to achieve its theoretical capacity. This may take the form of extension of the tunnel to Yeronga or further south of Yeerongpilly. If, the option of extending the BaT rail Tunnel component proves to be engineering impractical then other options will need to be considered.

This in turn, may logically also lead to significant future resumptions of residential properties from Dutton Park through to Salisbury for the additional corridor width. This was initially proposed by the ICRCs and as proposed early with the CRR proposal, which required substantial property acquisitions between Dutton Park and Yeerongpilly even as far as Salisbury.

If the current BaT project does proceed it will be clear in only a short time that it cannot optimize the rail throughput capacity of the tunnel tracks. Following that realization questions will arise as to why provision for extension was not a part of the scope of the BaT project.

There appears to be a serious lack of foresight to “future proof” this BaT project which may reasonably be perceived as an inferior use of valuable public funding as it will push significant funding and community disruption costs into the future. The consequence is a need to expand the BaT Project scope and footprint to allow this project to fully reach its potential capacity, if this in fact can be achieved at all given the current political constrained project criteria.

Provision for growth on the rail corridor north of Brisbane

The alignment design shows no connection to the north which would expand capacity in this area. The CRR EIS indicated this additional capacity was needed at day 1. CRR also allowed for a connection to the future Trouts Road transport corridor such an option needs to be provided for. Lacking these effective connections to the north reduces the effectiveness of the BaT Project to service growth to and from the north of Brisbane. This results in limited overall longer-term rail network capacity benefits. This seems to indicate that the BaT project rail components are overly focused on meeting the potential needs of Gold Coast passengers, whilst not dealing with the overall future network passenger needs with in SEQ.

Provision for growth in services and Stations

The EIS information indicates there is only provision for 6 car trains (and maybe 7 car) long stations with single side platforms. This is a short sighted decision. If the BaT Project is to attract the level of passengers to justify the investment it should make allowance for higher level station throughput in the future otherwise the saturation capacity with loading and unloading passengers will ultimately constrain capacity. We would suggest there needs to be provision for additional platforms at the underground stations and longer platforms as well as high speed and capacity lifts.

At the very least, the BaT Project should be constructed in a way so as not to preclude/exclude the ability have 9 car trains and island platforms with 4 rail tracks.

CRR's planning indicated that the move to 9-car trains was required before 2031 to adequately deal with the increasing capacity on the network, which cannot be accommodated with 7-car trains. 9-car trains also offer the most cost-effective method of mass transit, with one train capable of transporting up to 1500 passengers.

The disruption and expense associated with expanding the underground stations in the future would be prohibitive. It is in our view undesirable for limitations being embedded into this project that prevent future capacity enhancements, such as longer and 4 platform stations.

It is important that provision is made within the BaT project design to allow for future enhancements, such as longer platform footprints for 9 car trains as well as 4 platform stations. If such provisions are made during the initial project construction the opportunity for a relatively inexpensive capacity enhancement can subsequently occur. Otherwise without future expansion provision in the BaT project design and the construction by allowing the operation of additional carriages and the carriage of significantly greater numbers of passengers on each service will be lost.

Impact on rail services during construction phase and post project operations

The area of the network between Salisbury and Dutton Park is a shared passenger and freight section on the metropolitan network and any construction activity has potential adverse implications for both passenger and freight services on this corridor. Currently the dual gauge line from Salisbury to Dutton Park is shared between Gold Coast express services in the peak hours and in the non-peak is used by freight trains. The lack of track enhancements in this area will no doubt present significant capacity challenges for this single dual gauge track going forward.

Noting this capacity challenge, the RTBU would question how the construction and staging of surface works will impact on existing freight train services that use the existing surface network where the Project ties-in with the existing network. The EIS is very deficient on specific detail on how the

construction staging and track closure plan may impact on freight services, this is of concern.

The RTBU would also like to understand how operation of the Project post construction will impact on rail freight reliability and capacity going forward.

The rail freight industry is currently facing significant challenges maintaining modal share; and construction impacts and post construction limitations on operations may have a significant detrimental impact on rail freight operators using this section of the network and their customers.

Construction Impacts on Rail Freight

The southern and northern surface approaches and exits to the BAT tunnels are located on critical rail 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 Proponent does not properly understand the adverse impacts of a prolonged construction phase and post construction effects on rail freight services. The sparse information in the EIS on the impact on rail freight service during the construction phase and the post project capacity and reliability is of concern. There also does not seem to be an understanding of the Proponent how rail freight works and the important role and contribution that rail freight plays in the economy of Queensland, in addition the direct revenue contribution of freight access charges to the ongoing funding of the rail network maintenance.

The RTBU's perception is based on the Proponent's comments on P 8-286:

"The extent of surface works south of the portal at Dutton Park and north of the portal at Victoria Park would be significant. Generally all passenger and freight rail services would continue to operate except when the Project takes possession of the tracks through targeted night time (outside of passenger rail operations), weekend and other longer period rail shutdowns.

Construction activities requiring a railway shutdown would be planned well in advance to minimise disruption to the network as a whole by, for example coordinating construction with already scheduled rail maintenance activities."

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, this is to avoid congestion and associated delays and to meet the demands of end users for delivery of consumer products 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 BAT 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 several years. This would particularly be the case if insufficient spatial property allowance is made to facilitate "off-line" construction activities to occur.

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 and above rail operators businesses.

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

Whilst 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 key passenger and freight corridors. Passenger rail services can be provided with some extent 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 to the economy of Queensland, 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 BAT project.

Challenges associated with the BaT Project

In this section, the RTBU will highlight some of the challenges associated with the BAT 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. Specifically in the case of the BaT project it has adopted a criterion of avoiding any residential properties acquisitions for this stage. However, it is clear at some stage in the future that additional enhancements to the rail network will be required to optimize the BaT project capacity.

The BAT 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 BAT project assessment process and conditions of approval.

It is noted that on a number of occasions in the past the Proponent (TMR) dismissed suggestions with responses about the “costs associated with” adoption other related enhancements. Whilst the RTBU recognises that cost is an important consideration, the long-term and intergenerational benefit of adopting some of the suggestions would far outweigh the short-term cost considerations. As an example, adopting a longer-term view allows planning and development to occur around the ultimate requirements, rather than causing future disruption to communities that have developed around a transitional short-term outcome. Otherwise if activity development is allowed to occur where it is

obvious future vital rail enhancements required for the ability to optimise the initial project and investment would be seriously compromised.

The BAT 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 BAT project at the southern tie-in point 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 economic costs and risks in the long-term.

Additional network enhancements should be considered and provided for before construction occurs to improve the capacity delivered by the project in the medium and long-term, rather than having a narrow focus on only the Bus and Train tunnel in isolation.

Without the provision of additional surface track infrastructure, the significant investment in the BAT 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 ultimate 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.

Emerging and future BaT rail issues

The freight implications of the revised BAT 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 BAT 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 BaT project will be an issue. However,

the increased number of passenger services that will be induced through the provision of the BAT 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 BAT tunnels are on critical corridors where freight and passenger trains converge/cross on shared sections of track within the SEQ metropolitan network.

Whilst the BAT 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 BAT project currently appears to be planning through the prism of a 20-year operational 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 BaT 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 ultimate 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 BAT Project must address these issues early and make adequate provision for future enhancements to deliver maximum value from the significant investment in the BAT tunnels. At the very least the future operational strategy should be published on how this significant investment can be optimised to ensure that tax payers funds are not wasted.

The contradiction and deficiency between the "Rail Problems" as defined and acknowledged in the EIS and what the BaT project is trying to achieve is glaring. The BaT project appears to fail to learn the lessons of the past and its own highlighted "Rail Problems" in the EIS.