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Reference:

SCAN2009/28522

20 November 2009

Mr Jason Maher  
General Manager  
Rail and Intermodal  
Nation Building – Infrastructure Investment  
Department of Transport, Infrastructure, Regional Development and Local Government  
GPO Box 594  
CANBERRA ACT 2601

JM 24/11

Dear Mr Maher

**RE: DISCUSSION PAPER – ADELAIDE RAIL FREIGHT MOVEMENTS STUDY**

Thank you for the opportunity to comment on the above Discussion Paper. The Lord Mayor, the Hon Michael Harbison has asked me to respond on his behalf.

Adelaide City Council has no endorsed policy position on rail freight movement, or the current or future rail alignment. Therefore, the following comments are staff comments only, informed by general Council policy relating to sustainable transport and urban development.

Our response is largely confined to the invitation on page 5 of the Discussion Paper to provide feedback on "other features of the alignment that are important for the Study to take into account", with this being viewed as an opportunity to influence the terms of reference of the Adelaide Rail Freight Movements Study.

In summary, we would like to see the terms of reference modified to include:

- (1) *An expanded study area* - The impact of alternative alignments on rail freight movements in near City locations to the north of Adelaide, not just those adjacent to the current alignment from the Adelaide Hills to the City of Adelaide.
- (2) *Consideration of the impacts of rail alignment on the development potential of adjacent land* – The impact of freight rail alignment on the development potential of land on the City boundaries and in near City areas.

These points are discussed further below.

*Expanded Study Area*

As noted in the Discussion Paper, part of the existing alignment is within the boundaries of the City of Adelaide: it passes within the north-western Park Lands, at one point close by the site of the proposed new Royal Adelaide Hospital at the western end of North Terrace. The existing alignment also forms the western boundary that the City shares with the City of West Torrens.

Although it appears to be beyond the study area, the freight route continues north and west, at one point passing within 120 metres of residences in North Adelaide. Beyond this, freight movements affected by the current alignment pass adjacent to residential properties in a number of other council areas.

We suggest that the study examines the impact of the different alignments on rail freight movements throughout the metropolitan area, not just those from the Adelaide Hills to the City of Adelaide. The Adelaide City Council has a particular interest in those suburbs within and adjacent to its boundaries, and we regard the impact of rail freight movements on these suburbs as not just "amenity" or "social impact" issues, but an important economic issue as well.

*Impacts of rail alignment on the development potential of adjacent land*

The State Government's draft 30 Year Plan for Greater Adelaide identified opportunities for high density development in the suburbs adjacent to the Adelaide City Council area, particularly to the west. Residents in neighbouring suburbs are high users of the City, whether as students, workers, visitors, or a combination of these. They are also more likely to visit the City using sustainable transport modes than residents further out.

The residential development potential of areas immediately to the west of the existing freight railway are negatively impacted upon by noise, vibration, severance and pollution associated with rail movement.

These impacts will diminish significantly once the metropolitan passenger services are electrified over the next decade. However, diesel-fuelled freight movements – particularly those that occur at night – are likely to continue to inhibit high quality residential development unless a northern alignment is adopted.

Finally, there is an apparent absence of any reference to the impact of alternative route alignments on the interstate passenger rail services. It is assumed that an alignment that removed the need for freight to use the standard gauge line through the Adelaide Hills would call into question the need for such a line, with obvious implications for the passenger service to Melbourne. We trust that this will be addressed in the study.

Should you require further information, please do not hesitate to contact Ian Radbone (Transport Planner) on 8203 7797.

Yours sincerely



Adrian Stokes  
**Manager Sustainability**