



131 Belair Road  
Torrens Park  
South Australia 5062

Postal Address  
PO Box 21  
Mitcham Shopping Centre  
Torrens Park SA 5062

Telephone (08) 8372 8888  
Facsimile (08) 8372 8101

Email:  
mitcham@mitchamcouncil.sa.gov.au

Website:  
<http://www.mitchamcouncil.sa.gov.au>

Date 10 November 2009

Refer enquiries to  
FF: 06.579  
Phone: 8372 8131

Ms Debra Robertson  
Rail & Intermodal Branch  
Adelaide Rail Freight Movements Study  
Department of Infrastructure, Transport,  
Regional Development and Local Government  
GPO Box 594  
CANBERRA ACT 2601

Dear Ms Robertson

**CITY OF MITCHAM SUBMISSION - ADELAIDE RAIL FREIGHT MOVEMENT  
STUDY DISCUSSION PAPER - OCTOBER 2009**

*Please find listed below the City of Mitcham's comments as compiled by the Rail Freight Sub Committee:*

GHD was charged with 'having regard to economic, environmental and social factors' in its proposals, yet disappointingly for the Adelaide Hills community and for all Australians with long term and integrated vision, its reference to social and environmental amenity and impact seems thin by comparison to the emphasis placed upon economic rationalisation.

The costings and other calculations in this discussion paper are questionable and the discussion paper fails to give equal importance to issues of health, amenity, and safety, which threatens any far-sighted and sustainable vision for a better future. We request that triple bottom line principles are used when conducting the cost benefit analysis.

A risk assessment needs to be undertaken on all options, highlighting where and what the risks will be.

While this discussion paper does acknowledge the inadequacies and limitations of the outdated existing Adelaide Hills freight rail system, the discussion paper insists that 'the current alignment can handle....more than double the 4.8 million tonnes per year that are currently carried on the rail line.' (p 5) As it goes on to forecast a possible volume of 22.3 million tonnes by 2039, two questions need to be addressed – 'How would this antiquated, steep, tightly curved Adelaide Hills line cope with four times the volume of freight in the long term?' and 'How would this scenario impact socially upon the Hills community already enduring unacceptable levels and frequency of wheel squeal and traffic delays, and what would be the economic long term ramifications upon the industry itself?'

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### OPTION 1 - THE UPGRADING OF THE EXISTING ADELAIDE HILLS LINE.

The discussion paper's Option 1 seeks to alleviate the problem by proposing an upgrade of the existing line with its estimated cost of \$0.7 billion, low compared with its cost estimates for by-pass Options 3 and 4. It insists that this level of expenditure would 'reduce road traffic delays as well as residential noise levels', a claim hard to justify considering the projection of more and longer and heavier trains, and considering that the ARTC's \$0.5 million Rail Squad noise monitoring program has achieved no reduction to date, at least by community perception, in the frequency or level of noise after almost four years.

While the discussion paper analysed then dismissed Options 2 and 5, it chose not to dismiss Option 1 which is of concern for the following reasons, most of which either have not been addressed by the discussion paper or accorded the emphasis they deserve.

Option 1 should be dismissed for the following reasons:

- over the long term the continual 'patching up' required by the Adelaide Hills line may require equal or greater expense than Bypass Option 3.
- major disruption to both freight and metropolitan rail and roads during the upgrade in which tunnels and overpasses would need to be heightened to allow for double stacking and parts of the line reconfigured to cope with trains up to 1800m in length.
- greater number of longer and heavier trains means an increase in noise frequency and levels suffered by the Hills community.
- inefficiency of running to time schedules (55%) results in noisy idling including locomotive revving, and shunting noises.
- greater number of longer trains and the expected greater number of cars means continuation of and increase in traffic hold-ups at level crossings, including the very real possibility of emergency service vehicles suffering crucial delays.
- greater number of longer trains means continuation of and greater potential for vehicular accidents at level crossings, particularly in a bush fire event.
- greater number of longer trains means continuation of and greater potential for bushfire risk.
- greater number of longer and heavier trains means increased potential danger of derailments in residential areas, given that "trains would...continue to face the steep grades and tight curves of the existing route." (p.18)

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- longer and heavier trains will require up to five locomotives to pull them through the steep terrain. This raises the issue of pollution in built-up areas, and on-going high energy, wear and tear and maintenance costs for the industry.
- longer and heavier trains will still not be capable of travelling safely more than an average of 35 km/h which will continue the status quo of the Adelaide section of the Melbourne Perth Darwin line remaining as the weakest economic link.
- longer heavier double stacked i.e. top heavy trains will be unstable and may increase the risk of derailment.
- perpetuating this weak link undermines the economic, social and environmental benefits generally recognised as favouring rail rather than road transport, and especially considering the possible introduction of B-triple trucks on the Melbourne-Adelaide road corridor already struggling to accommodate the volume of cars and road freight.
- 'Adelaide is expected to experience a gradual decline in its relative importance as a rail destination and origin point over the next 30 years' (p 9) whereas 'Perth's role as a rail freight origin and destination point is expected to grow at a faster rate than that of Adelaide...' (p 9)
- to continue to use the existing line for haulage of freight will preclude the possibility of developing a fast efficient dual commuter line extending as far as the rapidly developing Mount Barker and Murray Bridge and associated surrounding regions.

Summing up, despite Option 1 being the least expensive option (in the short term at least) of the three proposals, to upgrade the existing line solves none of the prevailing economic, social and environmental concerns. In fact, by expanding frequency and volume of freight travelling through densely built up areas will inevitably exacerbate adverse and long term impact upon the community, as well as condemning the Adelaide Hills line to remain the weakest link in the east-west chain economically, socially and environmentally for decades to come.

*In conclusion, we respectfully submit that Option 1 be dismissed.*

#### OPTIONS 3 AND 4 – THE BYPASS OPTIONS

As the discussion paper points out, if either of the by-pass options were implemented, all freight movements through the hills would cease, as would the corresponding problems outlined above and experienced by a long-suffering hills community. This is a major point which deserves emphasis, along with acknowledgement that the two bypasses proposed and up for scrutiny, because of flatter and straighter terrain, allow for long term economic savings for the rail freight industry.

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The discussion paper seems to favour Option 4, the New Southern Bypass involving 15 km of tunnelling from Kangarilla to Cross Road, over the northern bypass Option 3, proudly stating that the 'tunnel would be the longest freight tunnel in Australia' (p 13) and pointing out its attractive features of low operating costs and its potential to reduce transit times with an accompanying low fuel consumption and polluting emissions, however all these features can be attributed to the more modest Option 3.

#### OPTION 4 – THE TUNNEL BY-PASS FROM KANGARILLA TO CROSS ROADS LEVEL CROSSING

As the proposal currently stands there are several good reasons to dismiss this option in favour of Option 3. Firstly, at \$2.4 billion this is by far the most expensive of all the proposals.

Secondly, the tunnel is designed to surface to the southern side of the Cross Road level crossing. However all current issues at and north of Cross Road remain unresolved. For example, the freight trains will still:

- need to traverse several level crossings through heavy traffic in the city
- compete with Hills commuter trains
- need to slow to speeds such as 35 km/h
- emit pollutants throughout residential areas
- compromise the future of a state of the art commuter system into the Adelaide Hills

The above limitations contradict the discussion paper's assertions that under Option 4 'commercial freight traffic on the existing route would cease, and this would provide a full resolution of the community amenity issues associated with operations currently on the Adelaide Hills route.' (p 19).

*In conclusion, we respectfully submit that Option 4 be either amended to address the above concerns, or dismissed.*

#### OPTION 3 – THE NORTHERN BYPASS SOUTH OF TRURO TO TWO WELLS

In contrast to its grandiose plans of Option 4, the discussion paper seems to show no real enthusiasm for the \$1.4 billion Option 3, even attributing particular negatives to this plan such as 'improvements would be required to the short tunnel and the bridge at Murray Bridge.' (p 18) Yet these same improvements will be required at Murray Bridge whether or not the double stacked trains use Options 1, 3 or 4.

The discussion paper also claims that this particular route would require 'extensive bridge and cutting work' near Truro, and that this cost has been covered in the budget. The proposed cost of \$9M/km seems excessive compared with recently completed comparable projects (\$1M-\$3M/km). However, its statement that bypass Option 3 will disadvantage Adelaide bound freight is softened by its own forecast of an expected increase of freight in and out of Melbourne and Perth as opposed to a relative decline in Adelaide as port of origin over the coming years.

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The discussion paper also acknowledges that the greater efficiency of the trains would partly compensate for the extra time taken to complete the indirect route.

There are several very good reasons to champion Option 3, the northern bypass from Murray Bridge to Two wells passing to the south of Truro. Once again few of these positives have been mentioned in the discussion paper.

The benefits of Option 3 are that it:

- will cause no disruption to freight trains on the Adelaide Hills line while being constructed.
- bypasses the Adelaide Hills line all the way (indirectly) to Islington, thus leaving the entire line uncompromised for future development planning and completely alleviating the current adverse impact of freight movements on the community.
- travels through 'currently sparsely populated country and poses relatively few social issues' (p 18) (i.e., noise, level crossing delays, derailments in built-up areas, pollution, bushfire risk)
- travels through relatively flat terrain, allowing for a relatively straight line and train speeds of up to 115km/h and reducing the number of locomotives needed to pull the trains, thus lessening pollution emissions while increasing economic viability.
- allows construction of long straight sections of tracks.
- reduces risks associated with derailments by travelling through relatively flat and sparsely populated terrain.
- allows trains to be double-stacked and to increase length to 1800 metres long.
- saves over two hours transit time for all freight travelling direct between Melbourne and Perth/Darwin, thus bringing long term economic benefit to the rail freight industry and thus providing an attractive alternative to road haulage.
- requires relatively low costs associated with land acquisitions.

To sum up, Option 3 is the best of the presented options to replace one of Australia's oldest and weakest links in the rail freight network with an economical and socially-friendly alternative, providing a long overdue integrated approach which will help to carry the nation's rail freight well into the 21st century.

*In conclusion, and considering the long term advantages inherent in Option 3, we respectfully submit that this proposal be adopted and implemented.*

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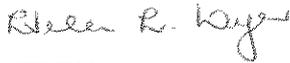
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ADDITIONAL CONSIDERATIONS

1. Are the tonnage figures quoted net or gross considering the capacity of the line?
2. Have the costs quoted for option 1, 4 and 5 taken into account track reconstruction to a new standard or movement of the track to improve centre distance along side the Trans Adelaide line and the construction of flyover at Goodwood?
3. The intangible benefits associated with Option 3, including the reduced delay times and community disruption at rail crossings must be considered in the benefit cost analysis.
4. Option 3 will reduce the maintenance and operator costs of the system.
5. There are great environmental benefits of a bypass option. For example, the unique and very well patronised, and second oldest park in Australia, Belair National Park will be further negatively affected if the freight volume increases on the existing line. There are also health, safety and security benefits.

Yours sincerely



HELEN DYER  
CHIEF EXECUTIVE OFFICER