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19 November 2009

Jason Maher
General Manager
Rail and Intermodal
Nation Building – Infrastructure Investment

Dear Mr Maher

ADELAIDE RAIL FREIGHT MOVEMENTS STUDY

Thank you for your letter of 10 November 2009 advising Council of the Adelaide Rail Freight Movements Study inviting Council's consideration and submission.

At a Council workshop on 17 November the study was discussed and a draft response considered. Council's submission has now been finalised and is attached to this letter. The submission attempts to reference the various parts of the study to enable easy cross referencing.

By way of a brief summary Council believes that the ongoing movement of rail freight along the western boundary of Council adjacent to the Churchill Road corridor has the real potential to severely limit the capacity of Council and the State Government to fulfil the planned objectives associated with the 30 Year Plan for Greater Adelaide. In this respect it is the Council's view that option 3 provides the overall best result for all groups who have an interest in rail freight movement. Providing a new route, as outlined in option 3, also provides a potential for an alternate route in case of emergency eg. derailment, by retaining the existing line through the Hills.

Should you wish to discuss Council's submission further please do not hesitate to contact Sam Green, Director Environment and Planning, on 8269 5355.

Yours sincerely

Mark Goldstone
Chief Executive Officer

ADELAIDE RAIL FREIGHT MOVEMENTS STUDY – COMMENTS

Section of Study	Position identified in study	Council comment
1.2	<ul style="list-style-type: none"> - Study talks about the corridor between Murray Bridge and Islington impeding efficient movement of freight - Study outlines other concerns with the Adelaide Hills corridor eg. steep grades, tight curves, 50% more locomotive power/tonne 	<ul style="list-style-type: none"> - Why Islington when loading and unloading of rolling stock and maintenance is all at Dry Creek? - There is no mention in the background that rolling stock can't carry containers double stacked through the current route due to tunnels and low bridges.
1.3	<ul style="list-style-type: none"> - Study talks of considering the feasibility of a new rail alignment proposed by the Mitcham Council 	<ul style="list-style-type: none"> - The Mid North Regional Development Board, Wakefield Group of Councils and rural communities have discussed this for years, which should be acknowledged in such a report.
2.2	<ul style="list-style-type: none"> - The study refers to the track passing through six local government jurisdictions (Rural City of Murray Bridge, District Council of Mount Barker, Adelaide Hills Council, City of Mitcham, City of Unley and Adelaide City 	<ul style="list-style-type: none"> - Why does the study terminate in Adelaide City when the freight trains don't terminate in Adelaide City. Islington is referred to in the Report and therefore community amenity through City of P should also be considered in the Report.
	<ul style="list-style-type: none"> - At the end of Section 2 the study asks for other features of the alignment that are important to be taken into account. 	<p>Other features:</p> <ul style="list-style-type: none"> - noise pollution (braking, loads, number of engines) - diesel pollution, potential fires during summer - the weather, Adelaide Hills big impact summer and winter - the proposed inter model at Edinburgh/Virginia - rail use from regional areas like Barossa Valley
3.1	<ul style="list-style-type: none"> - 18% of the freight is bulk goods and bulk commodities like pulp, hay, grain and mineral sands. 	<ul style="list-style-type: none"> - The hay and grain figures are really low considering the states agricultural output. - The figures suggest that most of our grain is on the road when it should be by rail. The promotion of rail over road use should be considered as part of the strategy to redirect the rail.
3.1 Fig 3		<ul style="list-style-type: none"> - There is no mention of Adelaide/Darwin. - The figures associated with Melbourne to Darwin are too low indicating a lost

		<p>opportunity.</p> <ul style="list-style-type: none"> - Any realignment, such as Option 3, could be an attractor to increasing freight between Darwin and Melbourne. - Why is Mitsubishi mentioned in a Report dated October 2009? The plant closed in March 2008. - The likely future demand makes no reference to the impacts of climate change and carbon emission schemes that may deter road freight to go rail.
Fig 6		<ul style="list-style-type: none"> - Paragraph refers to Figure 7 GDP – it should be GSP not GDP and 2% growth per year- where does this come from? - The 2009 SA Budget growth is based on a forecasted GSP 2013 4.25%. - If Roxby Downs goes ahead, GSP could at least double again to 8%? This is a significant difference to the projected potential growth for South Australia outlined in the study. - The authors of the Report have also completely missed the mining boom we sit on in South Australia. Where is that in the figures?
Fig 7		<ul style="list-style-type: none"> - The economic growth figures are wrong, refer 2009 SA State Budget
4.1 Table Option 1	<ul style="list-style-type: none"> - As part of Option 1 it is suggested that a number of initiatives would be undertaken to reduce the social impact of freight operations on the surrounding communities 	<ul style="list-style-type: none"> - Examples should be given in the study to enable some consideration of whether the initiatives are likely to be satisfactory or not.
4.1 Table Option 2	<ul style="list-style-type: none"> - The Figure showing the option identifies Islington, presumably as a key location 	<ul style="list-style-type: none"> - Rather than identifying Islington the figure should indicate Murray Bridge to Pt Adelaide or Dry Creek or the future inter-modal to the north of Adelaide.
4.2		<ul style="list-style-type: none"> - There is no reference to freight to Darwin.
4.3.2	<ul style="list-style-type: none"> - When discussing the retention of the existing route without major upgrading a reference is made to delays to road traffic 	<ul style="list-style-type: none"> - The study has a strong focus on economic loss associated with delays and constraints to the existing rail arrangements. Economic loss associated with road traffic left sitting at lights in Adelaide, the impacts of late freight trains on morning traffic in the Adelaide hills and Adelaide suburbs, has not been

	<p>considered.</p> <ul style="list-style-type: none"> - Other existing impacts also include urban air pollution and noise pollution (particularly at night). - Retention of the existing route without major upgrading is also likely to significantly impact on the objectives of the 30 Year Plan for Greater Adelaide which has identified the rail corridor and surrounding properties as a growth corridor which envisages an increase in population living and working through the corridor. This increase would be severely compromised by the retention of the existing freight route due to the amenity impacts.
<p>4.3.4</p>	<ul style="list-style-type: none"> - Option 2 and 3 should also include freight between Melbourne & Darwin. - Option 3 would eliminate rail freight movement through Prospect and is supported by Council. - Option 3 would encourage more freight between Melb-Darwin – this benefit needs inclusion. - Option 3 potentially reduces costs to GM Holden. Wine from Barossa/Clare would not need to go to Pt Adelaide and agricultural products would not need to go to Pt Adelaide which is where the most of freight goes and comes from currently. - No mention is made of the deepening of Pt Adelaide Channel to take larger ships, which could switch ship traffic from Melbourne to Adelaide. A strategy to increase port freight in/out of Adelaide is a focus of Pt Adelaide. - No reference is made to the 30 Year Plan for Greater Adelaide and the importance of residential development in growth corridors along the northern line. - An opportunity exists to maximise benefit of the proposed inter-modal at Edinburgh/Virginia and a freight line from Two Wells being directed down the northern expressway (bypass Salisbury/Mawson Lakes) to Pt Adelaide or Islington. Removal of freight off the Adelaide to Islington/Dry

		<p><u>Creek is critical to the successful delivery of the 30 Year Plan for Greater Adelaide.</u></p> <p>- Option 3 really requires a complementary national transport strategy to get road freight (interstate) off the roads into RAIL (drive on-drive off rolling stock for semis and increased road tax on heavy vehicles). A huge environmental consideration and the future measure of freight miles and emissions being calculated into transported goods.</p>
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