

**ADELAIDE RAIL FREIGHT MOVEMENT STUDY**  
**Issues Not Dealt With In The Discussion Paper Nov 14, 2009**

Since this is the final chance to add comments to this study, I submit the following for your considerations.

The following items impinge on both the Discussion Paper and the Benefit-Cost Analysis (BCA) presented on October 23, 2009. Rail By-pass Options were roughly defined below.

**OPTIONS FOR BY-PASS ASSESSMENT**

| <b>Option name</b>   | <b>Geographic definition</b>                                     |
|----------------------|--|
| Base Case/ StatusQuo | Existing Adelaide Hills Railway route Islington to Murray Bridge |
| Option 1             | Existing railway as above upgraded                               |
| Option 2             | Northern By-pass Murray Bridge (north of) Truro to Two Wells     |
| Option 3             | Northern By-pass Murray Bridge to (south of) Truro to Two Wells  |
| Option 4             | Southern By-Pass Tunnel from Cross Roads to Monarto              |
| Option 5             | Option 1 plus Option 3   |

It was stated at the meeting by GHD "that to quantify or assign monetary values to the issues of Social or Community Amenity and Environmental Impact for such a project is extremely difficult to do, so that "...these issues are very hard to assess, and are usually assumed to be the best possible practice (undefined) or a bench mark figure is added for each option, with no further investigation required."

In the BCA documents as supplied, there have been no assessment values shown for the status quo-base case option. This implies that no value has been assigned for the above issues. Hence whatever that value is, it should be added to all other options by default as stated in the report. A minor issue-maybe but misleading. Would that be correct?

**REASSIGN OTHER VALUES**

The Mitcham City Council-Rail Freight Sub Committee (MCC-RFSC) & I emphatically state that if these values are too hard to assign monetary cost/benefit against, then some other comparison symbols must be used. If the public and responsible parties are to assess the impact of all these options on the Community, then some value-system must be used to get comparisons between them and so all can know before hand what to expect of each option !

Otherwise, it is respectfully suggested :-

**the Study has failed to address what was asked for in the Terms of Reference. (TOR).**

**TERMS OF REFERENCE :**

**AGREED BETWEEN THE FEDERAL GOVERNMENT & CONSULTANT.**

Briefly, this states the study objectives as:

- Analyze current freight and growth to and through Adelaide moving basically east and west.
- Analyze line capacity now and in future.
- Analyze impact of current freight line alignment on community amenity (social & environmental impacts).
- Identify options for future freight growth, assess costs and benefits and costs to take account of likely impact on community amenity.

In the introduction to the TOR, noise, safety and inconvenience for road users is cited, along with wheel squeal and other noise problems. These are Environmental Health Issues that would normally produce a curfew situation.

**ELABORATING FURTHER:**

In GHD's presentation an in-depth discussion of their findings in regard to the BCA was given. This was an economic rationalization for each option (except the status quo) with no reference anywhere to what the effects would be on parties other than the track owner and train operators. The Community did not figure a mention!

I believe there has been a definite move away from the central reasons set out in Mitchams' -(MCC-RFSC) opposition to the existing Adelaide Hills Railway. **I believe economic rationalization to be only one of the considerations.**

During the course of our investigations into the existing "status quo (base case)" operating system, MCC-Rail Freight Task Force became aware that it was **almost impossible to "fix or upgrade" the social and environmental problems (apart from massive costs associated) we saw attached to the existing railway.** This does not refer to operating or design efficiencies but to the problems that train operations produce in terms of social amenity along its length in the suburban zones and built-up townships and within the Adelaide Hills regions.

The MCC-Rail Freight Task Force report also **referred to the problems that re-construction would cause** on nearby communities and the living environment if an upgrade was proposed for the existing track.

A summary of that railway is that it has so many inconsistencies, it should be referred to as having "irreducible complexity" in engineering terms. What is currently **an Industrial Operation in a non-Industrial Zone or Dormitory area.**

### THE EXPECTED STUDY APPROACH

*The expected approach to the Federal Government study, "Adelaide Rail Freight Movement Study", and expected by MCC-RFSC as stated in the Terms Of Reference is the equivalent of an Environmental Impact Study. This would also include social amenity impacts. For example, no reference to the State Plan for the next 50 years is included, let alone forecasts of 500,000 population increase. Again, no reference is made to the loss of Tourist activity resulting from the freight railway cutting off passenger opportunities, etc.*

### DECISION MAKING PROCESS

1. Until such time as Environmental Health Principles and Policies are spelled out, it needs to be emphasized that decisions on this project can only be politically determined (by the Minister) on the lowest price or the number of votes gained. Subsequently, lobbying and resources needed to lobby will be a critical deciding factor on choice. This will affect public reaction!
2. The TOR cites that Australian Rail Track Corporation has taken some actions to measure the noise (for example) and address these with operators (ARTC included). However, there has been no progress on effective solutions (in 3 years) to noise and/or road safety/level crossing problems in spite of minor upgrades. While repeat offenders continue to use the system and ignore the noise issue.
3. An inquiry is also required to deal with the now extensive scientific evidence provided by the Federal Governments' ARTC to the State of South Australia Environmental Protection Authority who are apparently powerless to enforce train operators to stop creating noise or comply with any Standards. There are none! Noise levels in excess of 100 db continue to dominate the environment. This occurs from Salisbury north to Balhannah in the east. This is not a minor section of Adelaide.
4. There are many overseas Standards which can be used for railways to address noise and amenity criteria. A result of "No decision" in this study by the Federal Government for or against intransigent train operators will only lead to allegations of back-room deals or

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appeasement of vested interests. Until such time as more well-defined principles and policies for community health and amenity exist it is not surprising that the ARFMS Consultant has difficulty quantifying the social issues involved.

5. It is important that all the proposed options be examined by the same set of criteria as used for the existing track . This applies to Environmental /Community Health and Amenity issues as well.

**HEALTH ISSUES (for example - social amenity is not even raised).**

1. There needs to be an epidemiologically strong study which could show statistically higher rates of morbidity and mortality in areas affected by train noise.
2. A wealth of overseas studies indicating a link between adverse health effects and transport /railway operations are available.
3. Other measurement "devices" for morbidity and mortality can be used, such as individual health records, data on drug use, alcohol and prescription drug use, statistics of doctor visits, psychiatrists and the incidence of other health problems that do not require hospital admission.
4. A question should be asked of the Department of Infrastructure, Transport, R&LG as to whether they do not consider health & amenity research data into the effects of railway noise as a priority for any of their projects?
5. So far, there is no discussion on prevention of possible health problems, and health of individuals and communities does not take precedence over considerations of economy and trade. All aspects relating to health have not been considered.

**FINAL DECISIONS**

*The Federal Government must decide who to believe and why. How is the final decision to be made? Will some issues (which?) be weighed as more important than others? What political factors are not included in an EIS that needs to be taken into account !*

Some parts of the report at an earlier stage only mentioned some minor details without providing any solutions to issues arising in the future. These issues of safety have yet to be addressed conclusively, especially in regard to fire safety and emergency access/exit situations in the Adelaide Hills and suburbs generally.

The environmental impacts of upgrading the existing tracks would be disastrous to nearby residents, traffic movements, safety and the environment generally. As mentioned above The Rail Freight Task Force assessed the existing route as a problem of Irreducible Complexity.

No details are forthcoming and study time is running out!

Yours Faithfully

R.G.Hunt Civil Engr, BTech , U Of A;  
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