

Our Reference: TRIM 4845 PJW

Maldon to Dombarton Rail Link Feasibility Study
Nation Building Infrastructure Investment Division
Department of Infrastructure and Transport
GPO Box 594
CANBERRA ACT 2601

8 December 2010

Dear Sir/Madam

MALDON TO DOMBARTON RAIL LINK FEASIBILITY STUDY SUBMISSION

Thank you for your invitation to make a submission regarding the Maldon-Dombarton Rail Link Feasibility Study – Issues Paper.

Wollondilly Shire Council supports the proposal to complete the Maldon-Dombarton rail line as it would have the following potential benefits:

- Assists in delivering overall efficiencies in freight distribution and intermodal networks in the greater Sydney metropolitan region, thereby assisting Sydney's and NSW's economic competitiveness.
- Supports regional economic development by improving efficiencies in the transportation of freight (principally grain, coal, ore, cars)
- Facilitates regional economic development related to Port Kembla and its future expansion.
- Reduces truck movements on Picton Rd, Appin Rd, F6 and the Hume Hwy which will reduce fuel costs for transport, reduce greenhouse gas emissions, and improve public road safety conditions.
- Results in a more favourable separation of freight and passenger rail traffic on the Sydney network (particularly between Sydney and the Illawarra) which will improve passenger service capacity and reliability.
- Supports potential employment lands development in southwest Sydney, particularly for freight related business.
- May assist in the future electrification of the Picton line if the Maldon-Dombarton Line is electrified.
- Provides a longer-term option for future passenger transport between south west Sydney and the Illawarra.
- Brings to fruition a project that has received millions of dollars of investment without any outcome to date

The Issues Paper is comprehensive and highlights the majority of issues associated with this proposal. However some specific comments and suggestions regarding the terms of reference for the feasibility study are listed below:

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Mine subsidence

The Maldon-Dombarton line travels through areas which are proposed for future long wall coal mining (largely affected by Illawarra Coal's 30 year mine plan). The feasibility study needs to give consideration to the infrastructure design and cost implications of ensuring that the railway is capable of withstanding future surface subsidence when mining occurs.

Employment lands development in the Macarthur South Area

The Macarthur South area (extending from the southern urban edge of Campbelltown down to the Nepean River just south of Wilton) has been identified as a potential future growth corridor for Sydney's expansion for many years. At present major urban development in the Macarthur South Area is not occurring. The *current* State Government position is that the area is not yet needed for significant urban release in order to accommodate Sydney's housing needs. This position however could be reviewed in the future.

Nevertheless there is growing interest in, and pressure for, employment land developments in the general vicinity of the Hume Highway corridor and the Main Southern Railway Line. These two significant transport lines (which for much of the Macarthur South area are proximate to each other) make the area attractive to industries that can potentially derive direct benefit from such infrastructure. Wollondilly Council has therefore seen growing pressure for land to be rezoned in this area for freight distribution and warehousing and for intermodal facilities.

Wollondilly Council has recently released a draft Growth Management Strategy which recognises that land along this corridor has potential to support these kinds of uses and that such activities could support employment growth at a local and regional level.

The feasibility study needs to give consideration to whether the rail line could help support such land uses in this area and vice versa, whether the likely growth of these types of industries in the Macarthur South area, and in Southwest Sydney generally, are in turn able to support the viability of the rail line.

Future residential development in the Macarthur South Area and possible passenger use of the line

As stated previously, major urban development in the Macarthur South Area is not presently occurring and the State Government's position is that the area is not yet needed for significant urban release. It is noted that the terms of reference for the feasibility study specifically exclude consideration of the line as a passenger transport route. This is understood to be as a result of the pre-feasibility study indicating that the inclusion of passenger services would "*impose net economic costs on the line*". Nevertheless, debate about the timing and scale of residential development in Macarthur South continues and so the prospect of future major residential development in the area can not be ignored.

The feasibility study therefore needs to give consideration to the long term implications of substantial urban residential development in Macarthur South, particularly in the Wilton area which is in the vicinity of the proposed intersection with the existing Main Southern Railway line. Key questions to consider are:

- Would substantial residential development in the Macarthur South area (specifically around Wilton) have the potential to affect the operation and viability of the rail line for freight purposes?

- Would long-term substantial residential development in the Macarthur South area possibly support the eventual use of the line for passenger transport and how should this long term contingency be best accommodated?
- Would additional passenger services be better served by expanding services on the Main Southern Line, and electrifying the line between Moss Vale and Macarthur Station

Note: Council currently has a Development Application for Stage 2 of Bingara Gorge at Wilton. This DA includes 22 lots that are within 100m of the rail corridor.

Environmental Integrity of Catchment Lands

The Maldon-Dombarton line travels through environmentally sensitive water catchment lands. Although it is understood that much of the construction of the corridor has already occurred, the feasibility study should give consideration to the need for ongoing environmental management associated with the actual use of the line. This would relate to a range of issues such as spillage/contamination risks; weed management risks – particularly with the transportation of grain; erosion issues; bushfire risks; managing the impacts of increased access for track maintenance workers and associated service vehicles.

Climate change issues

The feasibility study should give strong consideration to the important issue of climate change and the need to reduce greenhouse gas emissions.

The issue of future oil cost vulnerability should also be addressed when looking at the benefits of completing the railway. Rail transport of freight is substantially more efficient than road transport and electrification of the line is also understood to be an option.

Potential for road freight to switch to rail?

The feasibility study should give consideration to this question in two ways. Firstly and most obviously, would road freight currently using the road network to and from Port Kembla potentially switch to the Maldon Dumbarton line? Secondly, is there potential for the completion of the rail line to support intermodal facilities and networks in Macarthur South or the broader south west Sydney region, thereby assisting in achieving regional transport efficiencies and mode shift.

Impacts on the Sydney passenger train network

The issues paper discusses the potential benefits of freight trains not having to go through the Sydney network and down the Illawarra line in order to reach Port Kembla. The potential to free up congestion on the Illawarra Line is noted. The feasibility study should therefore also consider whether or not the opening of the Maldon-Dombarton line would shift the passenger/freight conflict issue to other lines in the Sydney network, particularly the Southern Highlands line. This is a particular concern to Wollondilly Council as our Shire already has poor passenger train service levels.

External economic catalyst effects

The issues paper discusses the potential direct economic benefits of the line. The feasibility study needs to also consider the broader economic externalities, such as:

- Potential for the line to be a catalyst for economic development in the Illawarra and south west Sydney,
- Potential to support/compliment overall efficiencies in freight distribution and intermodal networks in the greater Sydney metropolitan region, thereby assisting Sydney's and NSW's economic competitiveness.

Other externalities

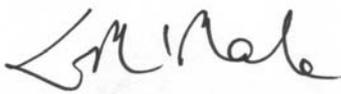
The issues paper covers a wide range of matters for consideration, including some consideration of externalities. Wollondilly Council would however stress the importance of the feasibility analysis giving a comprehensive costed approach to all foreseeable externalities. It is noted that the recent Cowra Rail line Network Revival Study undertaken by SAMROM Pty Ltd in 2009 contained a costed analysis of externalities including:

- Road maintenance
- Accident costs
- Greenhouse emissions
- Air pollution
- Noise pollution

A similar approach to the inclusion and costing of all externalities should be included in the proposed feasibility study.

Thank you for the opportunity to make a submission on this project. Council is supportive of the development of the Maldon-Dombarton rail line which has great potential to achieve a range of significant and positive economic, environmental and social outcomes.

Yours faithfully



Les McMahon
GENERAL MANAGER