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Adelaide Rail Freight Movements Study
Department of Infrastructure, Transport, Regional Development and
Local Government
GPO Box 594
CANBERRA ACT 2601

Re: ADELAIDE RAIL FREIGHT MOVEMENT STUDY DISCUSSION PAPER

Thank you for the opportunity to provide comments on the discussion paper. The City of Salisbury has considered the paper in the context of the strategic drivers that have influenced the level of infrastructure investment in the State, particularly road, and the future policy direction of the 30 year Plan for Greater Adelaide and provides the following comments.

In reviewing the Discussion Paper it is evident that economic, social and environmental assessment has been carried out on the railway line operation only. Freight logistics especially those that incorporate more than one mode, that is, rail and road or rail and sea, need to consider the total operational costs together with current and future infrastructure investments of businesses that operate in each of the transport modes that are associated with rail transport. This is considered a significant gap in the current analysis.

There also appears to be little or no strategic context and identification of market drivers that would influence the scope of the investigations or the options considered. Other current and future transport investment such as the Northern Expressway, Port River Expressway and the proposed Northern Connector and South Road extensions are not mentioned. These together with a new rail link will have a significant influence in determining future freight based industries. Future work should be informed by the following strategic directions from State Government and Peak Transport Groups for transport and land use planning in Adelaide;

- 30year Plan for Greater Adelaide – future employment lands, future population growth
 - Transport Network (freight)
 - The Northern Expressway
 - Proposed Northern Connector and the realignment of the rail freight line
 - The South Road upgrade
 - Future intermodal locations as per 30year Plan for Greater Adelaide
- Other Strategic Directions
 - South Australian Freight Council
 - Department of Trade and Economic Development strategy
 - Economic Development Board March 2009 Economic Statement
 - South Australian Road Transport Association

In assessing the impact to the community of the various alignment options the assessments made for the southern and northern alignments suggest that there will be few issues associated with an increase in rail freight activity. This will only be the case in the north if the freight rail line is relocated out of the Salisbury urban area to the new co-located route of the Northern Connector. If this Northern Connector link is not built, then there will be a potential doubling of the amount of freight trains that will use this line (those going from Adelaide to Melbourne), excluding future growth in freight.

The decision of a location of a new route to the north (options 2 and 3) will by its alignment and

connectivity with Adelaide to Darwin/Perth line, and the road transport network have significant flow on effects to the broader freight industry. The proposed alignment is that the new line from Melbourne will connect with the existing Darwin / Perth line in the vicinity of Mallala. This may impact upon the current operation and location of rail to road intermodals within the metropolitan area, particularly, Islington / Regency Park and encourage their relocation. Similarly other road transport operators aligned with the rail freight task located around Port Adelaide, Regency Park, Dry Creek and Greenfields may relocate towards a new transport hub.

Under this scenario the benefit would be a significant reduction in the amount of freight trains that would need to enter the urban area. The issues that are not identified in the report are that if the transport related industries would need from their existing sites and establish in the vicinity of the rail junction. These may include increased road transport distances and therefore increased fuel costs, emissions and cost to the consumer. It also does not maximise the current and future investment in road freight transport connections of the Northern Expressway / Northern Connector and the availability of readily serviced industrial land at Greater Edinburgh Parks.

The study has considered the rail alignment options based upon the topography of the routes and the potential growth in rail freight task. It does not consider the other logistics operations associated with the freight task, being the intermodals, road transport and warehousing industries that facilitate the distribution of the freight from the rail to its customers.

Council's City Plan and the draft 30 year Plan for Greater Adelaide identifies the future benefit of Greater Edinburgh Parks as a future employment land for the northern region and the potential for an intermodal that could facilitate the development of an inland port. An inland port commits to have a significant transport and logistics function with opportunities of export and import customs functions. In effect it becomes a significant port from which goods and commodities are processed for export.

In considering the strategic direction and the market drivers identified above an alternative alignment to the north should be considered by the study. A junction point closer to the facilities of Greater Edinburgh Parks warrants investigation as part of this study and should be recommended in the response to the discussion paper.

Yours sincerely

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