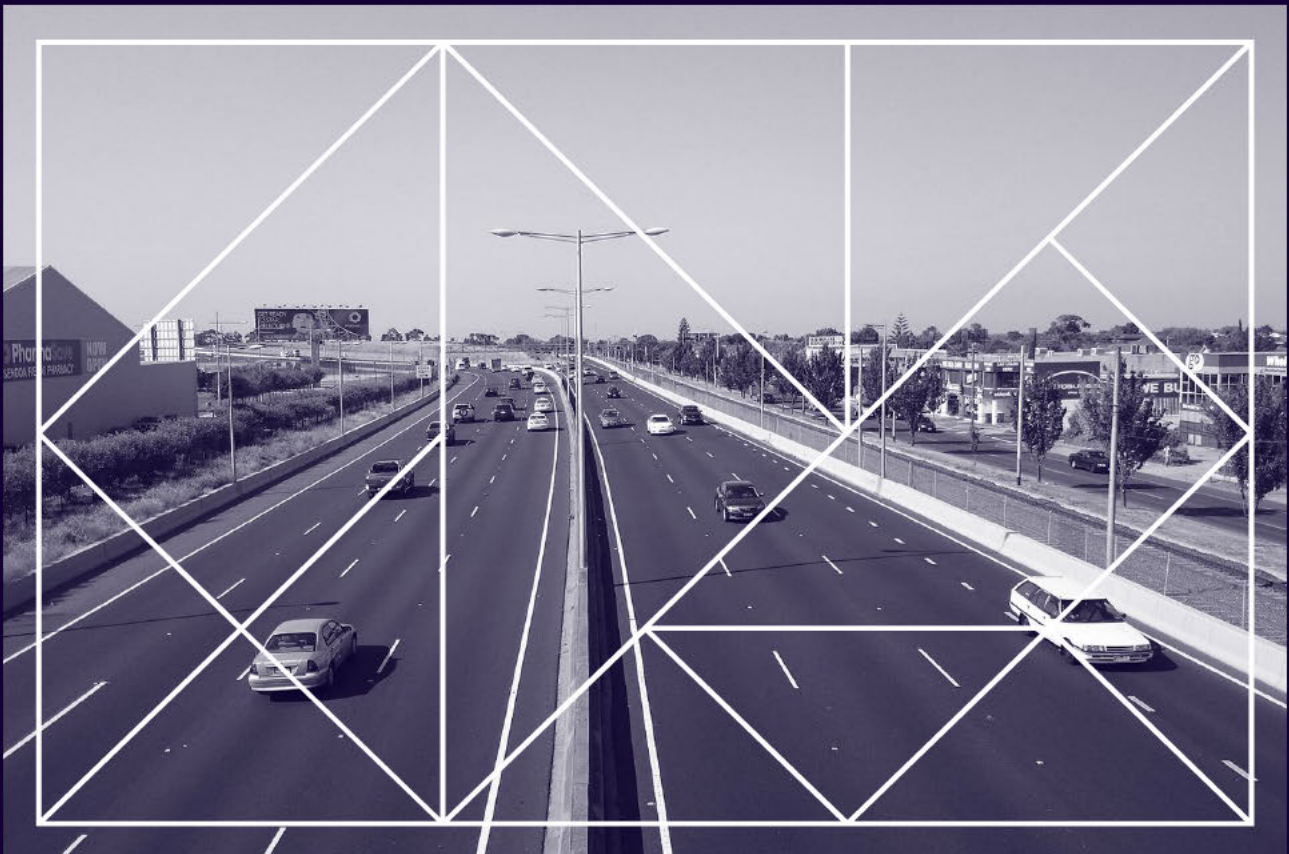


ACIL ALLEN

Independent Review of Tullamarine Freeway Demand and Capacity Modelling

Final Report

18 September 2025



About ACIL Allen

ACIL Allen is a leading independent economics, policy and strategy advisory firm, dedicated to helping clients solve complex issues.

Our purpose is to help clients make informed decisions about complex economic and public policy issues.

Our vision is to be Australia's most trusted economics, policy and strategy advisory firm. We are committed and passionate about providing rigorous independent advice that contributes to a better world.

Report to:

Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

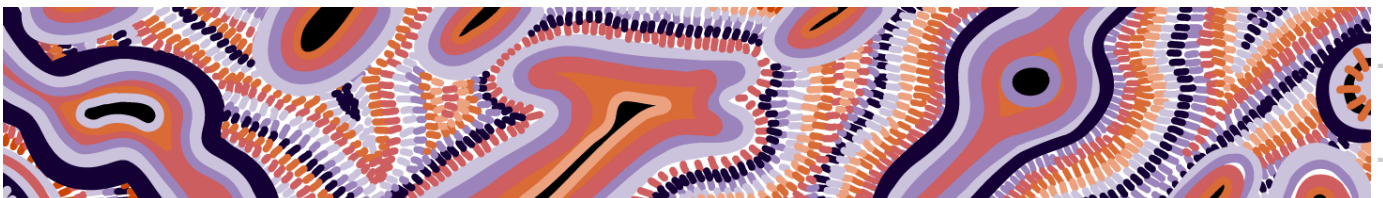
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ACIL Allen acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the land and its waters. We pay our respects to Elders, past and present, and to the youth, for the future. We extend this to all Aboriginal and Torres Strait Islander peoples reading this report.



Goomup, by Jarni McGuire

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Glossary

Abbreviations	Definitions
BITRE	Bureau of Infrastructure and Transport Research Economics
DTP	Department of Transport and Planning
MAR	Melbourne Airport Rail
MAR	Melbourne Airport Rail Line
MSFR	Maximum Sustainable Flow Rate
MTP	Metro Tunnel Project
SA2	Statistical Area Level 2
SALUP	Small Area Land Use Projections
SRL	Suburban Rail Loop
The Department	The Commonwealth Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts
VIF	Victoria in Future
VITM	Victorian Integrated Transport Model
VLUTI	Victoria Land Use and Transport Integrated[Model]
VOC	Vehicle Operating Costs
WFH	Work from Home

Summary of Findings and Recommendations

ACIL Allen was engaged to review the demand and capacity modelling undertaken by the Victorian Department of Transport and Planning (and its consultant KPMG) in support of consideration of the Melbourne Airport Rail Link (MAR) project. The modelling completed and reviewed is centred on the “Base Case” of any MAR business case, in that it considers transport network outcomes prior to any future investment in MAR. Outputs of the modelling are concerned with levels of demand and congestion, and the associated impact on travel times, related to trips to and from the Melbourne Airport via the Tullamarine Freeway, without MAR or any other infrastructure investment or intervention.

ACIL Allen’s report has not, and cannot, contemplate the benefits, costs or impacts of the Melbourne Airport Rail Link (MAR) project. The scope of the report is summarised by the Limitations described below, and is fully defined in Section 1.2 of the report.

ACIL Allen has made 11 findings and two recommendations, which are provided in full below. The Full Report provides the underpinning analysis which supports these findings.

Overall Assessment

Overall, ACIL Allen’s review suggests the modelling update prepared by DTP and its consultant KPMG are considered sound and a reflection of an emerging problem concerning efficient access to Melbourne Airport.

The modelling suggests that higher levels of capacity utilisation of the road network to Melbourne Airport will lead to rising congestion over the next 10 years, resulting in an increase in journey times for all users of the Tullamarine Freeway. Post-2036, the problem is projected to worsen, with all Peak periods and directions sitting above 80% capacity utilisation. By 2051, the roads around Tullamarine Airport are projected to exceed benchmark capacity, and journey times are projected to increase significantly.

All other things being equal, the cost to users of increased travel times could be mitigated through a targeted investment or public policy intervention, such as building the Melbourne Airport Rail Link (MAR).

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Given this, ACIL Allen recommends the Commonwealth undertakes a review of the economics of MAR as a solution to the Tullamarine Freeway capacity issue identified in the latest DTP/KPMG modelling of the road’s capacity and congestion. This is because of the substantial changes to inputs, parameters and outputs of the base case modelling could carry over to modelling of the performance of the road, and the broader Melbourne transport network, in the MAR investment case.

Report Limitations

ACIL Allen’s review is not a comprehensive assessment of MAR’s value, impact, or justification. Instead, it examines the assumptions and modelling related to road network demand **without the rail link**. Within this defined scope, our objective is to provide the Commonwealth with independent review on the modelling completed by DTP/KPMG, including identifying any parameters that haven’t been considered and an assessment if this data alters the expected timeframe for the Tullamarine Freeway reaching capacity.

ACIL Allen's review is not an assessment of the MAR Business Case, the timing of the MAR project, or associated matters. Reviewing the demand for and capacity of the Tullamarine Freeway effectively reviews the quantification of one part of the Base Case of the economic analysis underpinning MAR.

For clarity, the following limitations apply to the scope of ACIL Allen's work:

- **No independent modelling.** ACIL Allen has not undertaken any modelling. This review is based solely on the evaluation of modelling undertaken by DTP and KPMG.
- **No review of the "Investment Case".** Our review does not extend to the Investment Case – the scenario in which MAR is delivered. It does not include the modelling outputs or assumptions underpinning the Investment Case scenario in which MAR is delivered. As a result, this review does not provide a view on the overall effectiveness or justification of MAR as an investment.
- **No Cost Benefit Analysis.** Our review does not include an assessment of the costs or benefits of constructing/operating MAR. We have not assessed the financial, economic, or social benefits or costs of constructing or operating MAR.
- **No congestion impact assessment.** Our review does not extend to evaluating the broader impacts of MAR on traffic congestion across the network. Our focus is specifically on demand and capacity concerning the Tullamarine Freeway. This review does not assess whether MAR would reduce congestion across Melbourne's broader transport network.

Review Findings

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Finding 2 Changes to VITM Mean No Comparative Analysis Should Take Place

The DTP report identifies significant changes to the VITM Model, its parameters, inputs and assumptions in the 2025 edition versus the 2019 edition; the former is used as the basis for the current modelling, and the latter underpins the 2022 business case modelling. The scale of the changes is such that ACIL Allen recommends that no comparative analysis be completed, and the current modelling results be assessed on their merits as a standalone assessment of demand and capacity.

Finding 3 The process used to develop the modelling presented in the DTP report appears sound and fit for purpose

Overall ACIL Allen considers the work undertaken by DTP and KPMG to model future demand and capacity of the Tullamarine Freeway is sound and reflects usual practice for Victorian Government transport projects.

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Finding 5 Report would benefit from the presentation of more data

While a minor matter, ACIL Allen considers that the DTP / KPMG report would benefit from providing and reporting numerical results and data points to allow for greater ease of interpretation of the modelling. Presentation of these values would improve the robustness and usability of the report and its conclusions. ACIL Allen has sought to achieve this through requesting some of this data, and presenting it in our assessment report.

Finding 6 Modelling supports the problem of increased congestion and journey times on the Tullamarine Freeway

The modelling completed suggests the Tullamarine Freeway will reach capacity by 2031, and will exceed practical capacity limits (resulting in significant increases in journey time) from 2036 onwards in some directions/periods. If this finding is accepted, the cost to users of increased travel times could be mitigated through a targeted investment or public policy intervention.

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Review Recommendations

Recommendation 1 Further data should be provided to support an assessment of the size and scope of the identified problem

ACIL Allen recommends the Commonwealth seek additional modelling outputs related to the broader performance of the Tullamarine Freeway at additional model nodes to allow for a more thorough consideration of the identified problem and potential merits of various solutions.

Presenting additional model nodes would give the Commonwealth a richer and more comprehensive understanding of the future demand for trips on the Tullamarine Freeway, and provides the basis for a more fulsome consideration of the benefits and costs of the Melbourne Airport Rail business case. This is because while the majority of trips at the model node presented are related to demand for Melbourne Airport, the rail link would result in benefits for all transport network users and trip types through creating additional transport capacity available for all trips across the entire Melbourne transport network. Reducing the use of the Tullamarine Freeway for trips to / from Melbourne Airport also benefits *all* users of the Tullamarine Freeway, not just those accessing Melbourne Airport.

Recommendation 2 Review the economics of MAR as a solution to the Tullamarine Freeway capacity issue identified in the DTP/KPMG modelling

ACIL Allen recommends that the Commonwealth undertakes a review of the economics of MAR as a solution to the Tullamarine Freeway capacity issue identified in the latest DTP/KPMG modelling of the road's capacity and congestion. This is because of the substantial changes to inputs, parameters and outputs of the base case modelling could carry over to modelling of the performance of the road, and the broader Melbourne transport network, in the MAR investment case.

The economics of MAR is outside of ACIL Allen's scope of works, and cannot be contemplated based on the information presented (which was provided on the basis of what was required to address the scope of works).

Full Report

1 Introduction

ACIL Allen has been engaged by the Commonwealth Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts to complete an independent review of modelling of the demand for and capacity of the Tullamarine Freeway as it relates to a business case for the Melbourne Airport Rail (MAR) Project. This section is the introduction to the report.

1.1 Overview

Today, Melbourne Airport, Victoria's largest airport and Australia's second busiest airport by passenger movements, is principally accessed via the Tullamarine Freeway, which connects the Airport to the Melbourne Central Business District and other critical arterial and distributor roads through Melbourne and beyond.

The Victorian Government prepared a business case to support an investment in the Melbourne Airport Rail (MAR), finalising this in 2022. The business case makes the case for an investment in MAR principally due to rising demand and congestion on the Tullamarine Freeway, and associated impacts on travel times for commuters and industry. ACIL Allen understands the project has yet to be fully signed off on for delivery. The Victorian Government is seeking Commonwealth Government support for the project, given its significance to the Australian economy and the infrastructure's size, cost, and complexity.

In 2025, the Victorian Government completed an update to the Tullamarine Freeway traffic modelling, which underpins the economic analysis of the MAR Business Case due to the passage of time and continued deliberations regarding the project's merits. The Commonwealth Government, through the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (the Department), has engaged ACIL Allen to undertake an independent review of this modelling to assist in its considerations.

This report presents ACIL Allen's independent review of the Victorian Department of Transport and Planning's (DTP) *Tullamarine Freeway Strategic Modelling: Demand versus Capacity Assessment Report*, and associated documents.

ACIL Allen's role

Accurate and credible demand forecasts remain fundamental to the MAR Business Case, directly influencing the economic analysis of the project, its timing, and the ongoing financial viability following construction. Given MAR's strategic importance and the Tullamarine Freeway's high sensitivity to variations in airport-related travel demand, the reliability and completeness of these forecasts are critical.

The Department is seeking assurance that DTP has thoroughly considered all relevant parameters in the updated modelling. In this context, ACIL Allen was commissioned to undertake a strategic, independent review of the demand forecasting and road network sensitivity analysis. The purpose of this review is to rigorously examine whether any key modelling assumptions or parameters have been omitted or inadequately considered, and to assess whether these factors could materially alter projections, particularly the expected timeline for the Tullamarine Freeway reaching capacity.

ACIL Allen's assessment will provide the Department with additional insights regarding project risks and the timing of an investment decision as part of its consideration of MAR and associated investments.

1.2 Scope & Limitations

Scope

ACIL Allen has been engaged to provide an independent, third-party review of the demand forecasting and capacity modelling underpinning the Base Case scenario of the Melbourne Airport Rail Link (MAR) Business Case. The Base Case reflects a scenario in which MAR is not developed. The review evaluates the completed modelling, including any parameters that haven't been considered, and assesses whether this data alters the expected timeframe for the Tullamarine Freeway reaching capacity.

This review is based on modelling developed by the Department of Transport and Planning (DTP) and KPMG, using the Victorian Integrated Transport Model (VITM), which aligns with Victorian Government investment appraisal guidelines. As the VITM framework sets out predefined structures, inputs, and assumptions – most of which cannot be modified by the modeller – ACIL Allen has treated the VITM itself as a fixed, given framework.

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Within this context, ACIL Allen's role is to assess the reasonableness of the modelling assumptions and inputs, the outputs, and associated conclusions which can be drawn from the modelling.

Limitations

It is important to note that ACIL Allen's review is not an assessment of the MAR Business Case, the timing of the MAR project, or associated matters. Reviewing the demand for and capacity of the Tullamarine Freeway effectively reviews the quantification of one part of the Base Case of the economic analysis underpinning MAR. Modelling work underpinning the MAR Business Case occurring downstream from this capacity modelling would involve:

1. Quantifying the economic costs associated with the Base Case (i.e., transforming the demand and travel time outputs of this modelling into economic values using a series of parameters). This is often called the "Cost of the Problem".
2. Reviewing and costing of various solutions to address the Cost of the Problem.
3. Identifying the timing of one or more interventions, based on balancing the Cost of the Problem and the cost of taking action.
4. Quantifying the benefits of the selected option, which is often a feedback loop of addressing the Cost of the Problem (i.e., by creating additional capacity, the quantified Cost of the Problem is reduced or eliminated).

The items above are material considerations to the MAR Business Case, but are outside the scope of ACIL Allen's review. For clarity, the following limitations apply to the scope of ACIL Allen's work:

- **No independent modelling.** ACIL Allen has not undertaken any modelling. This review is based solely on the evaluation of modelling undertaken by DTP and KPMG.
- **No review of the "Investment Case".** Our review does not extend to the Investment Case – the scenario in which MAR is delivered. It does not include the modelling outputs or assumptions

underpinning the Investment Case scenario in which MAR is delivered. As a result, this review does not provide a view on the overall effectiveness or justification of MAR as an investment.

- **No Cost Benefit Analysis.** Our review does not include an assessment of the costs or benefits of constructing/operating MAR. We have not assessed the financial, economic, or social benefits or costs of constructing or operating MAR.
- **No congestion impact assessment.** Our review does not extend to evaluating the broader impacts of MAR on traffic congestion across the network. Our focus is specifically on demand and capacity concerning the Tullamarine Freeway. This review does not assess whether MAR would reduce congestion across Melbourne's broader transport network.

These limitations mean **this review should not be interpreted as a comprehensive assessment of MAR's value, impact, or justification.** Instead, it examines the assumptions and modelling related to road network demand without the rail link. Within this defined scope, our objective is to provide the Commonwealth with independent review on the modelling completed by DTP/KPMG, including identifying any parameters that haven't been considered and an assessment if this data alters the expected timeframe for the Tullamarine Freeway reaching capacity.

1.3 Summary of Approach to the Review

ACIL Allen's report is centred on a review of various documents provided by the Department via the Victorian DTP. ACIL Allen reviewed these and applies expert judgement regarding the reasonableness of:

- The modelling approach, including the application of the VITM and interpretation of its outputs
- The suite of inputs and assumptions used, to the extent these were in control of DTP and its consultant KPMG in undertaking the modelling
- The conclusions drawn, their basis, and the use of evidence developed and derived as a result of the modelling processes described in this report.

ACIL Allen's review provides assurance to the Department as to the findings and implications of the modelling work undertaken. This is a subjective benchmark rather than a quantitative assessment of model accuracy and performance, which as outlined above is outside of ACIL Allen's scope of works. The sum output of ACIL Allen's review is a series of 11 findings and two recommendations.

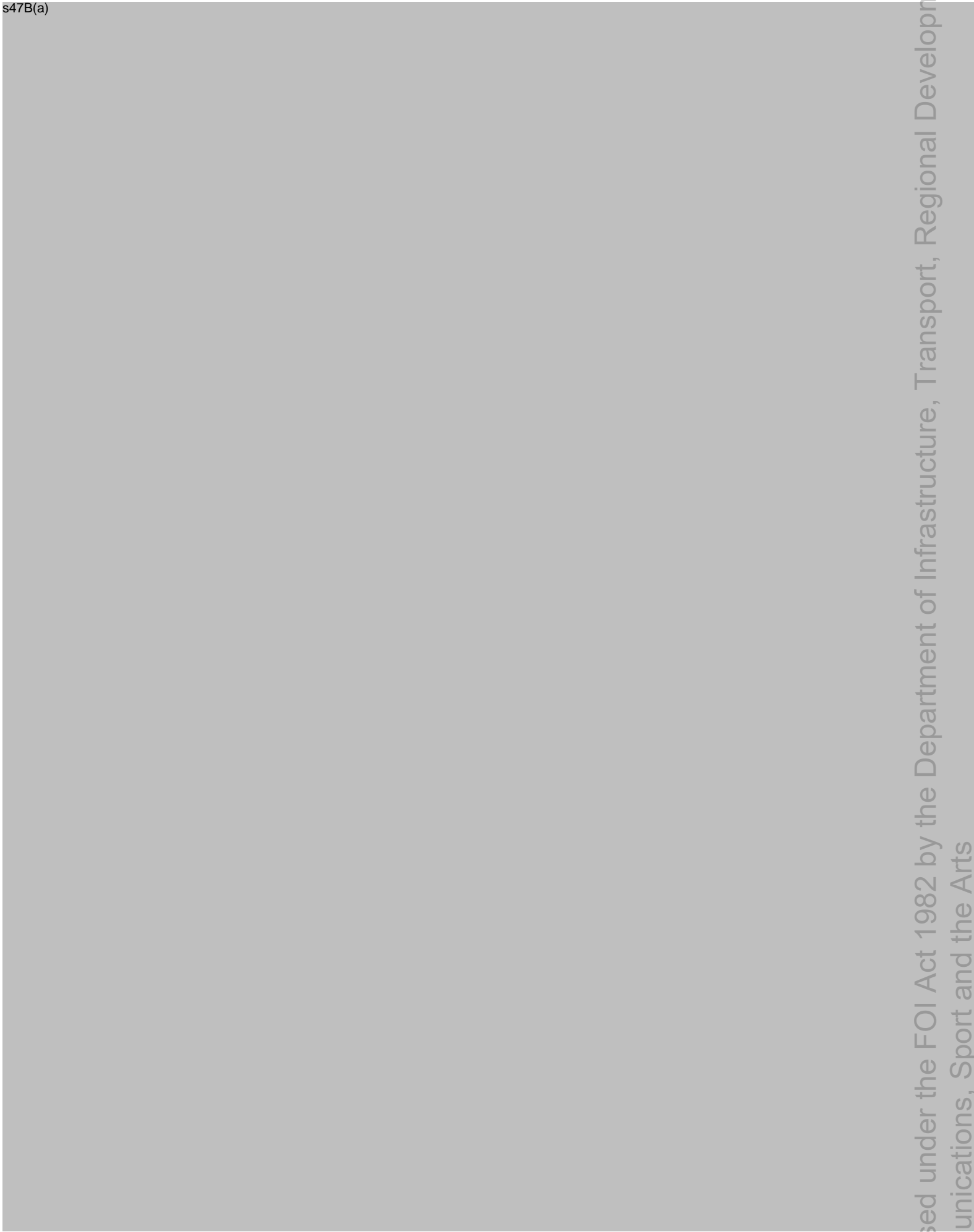
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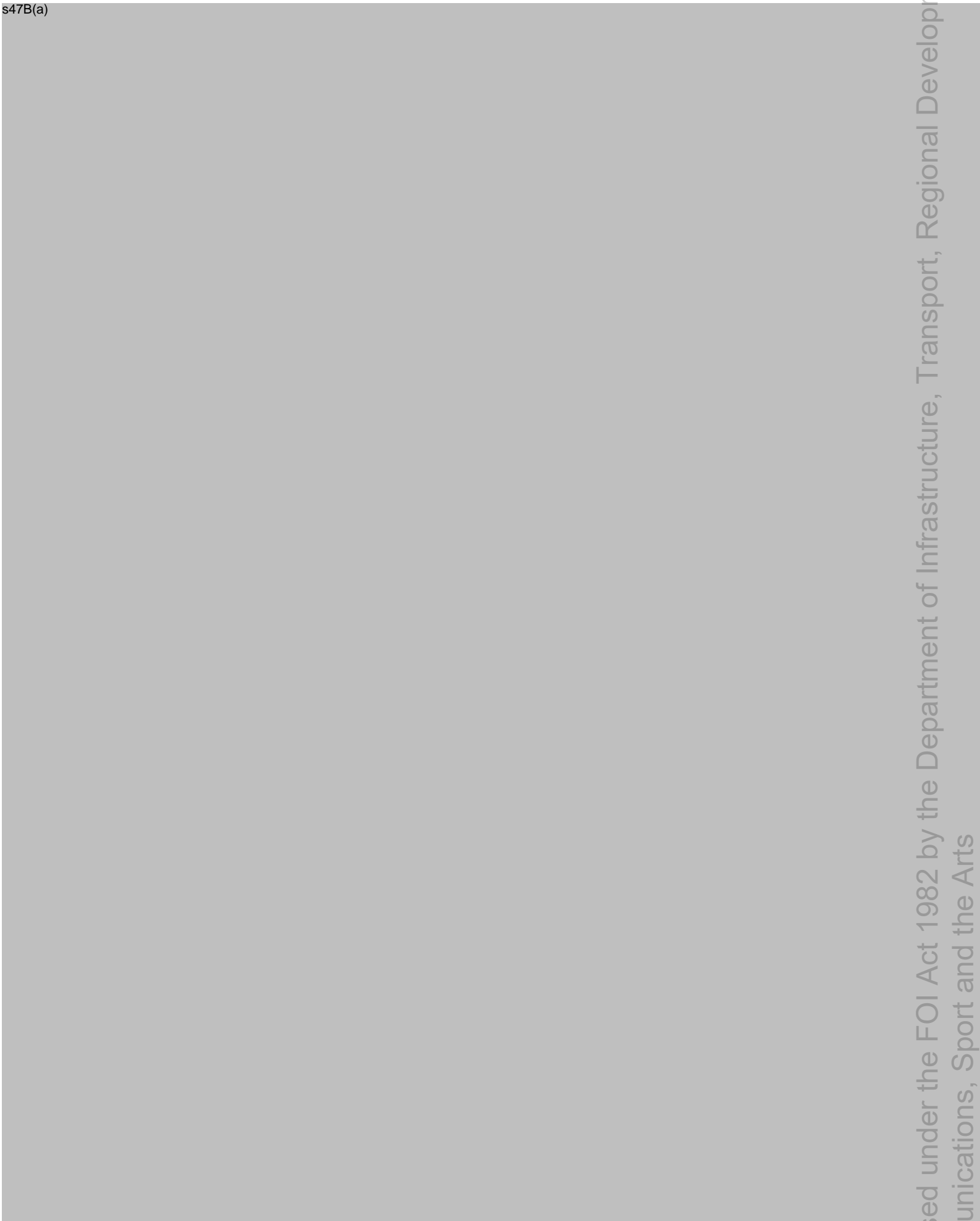
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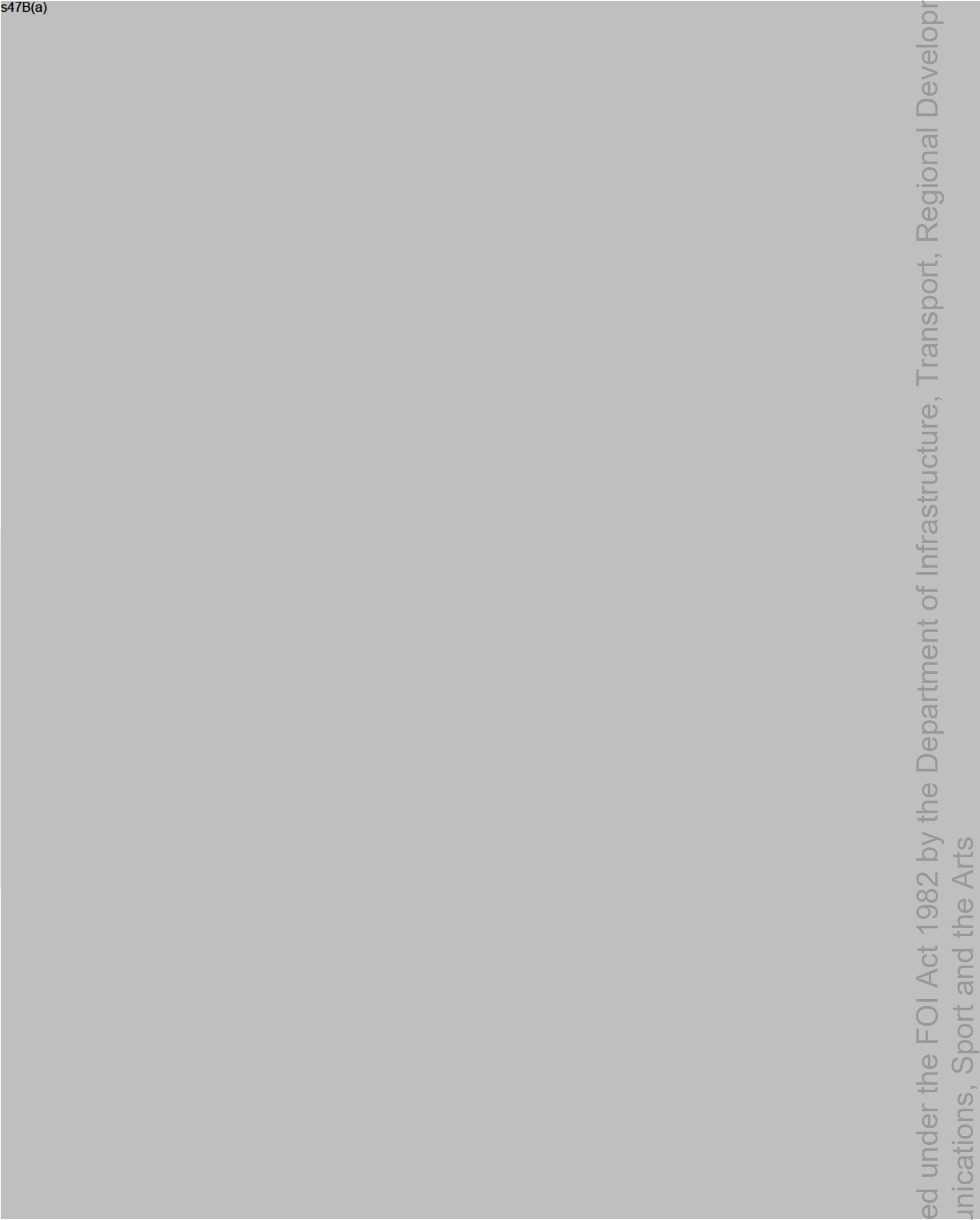
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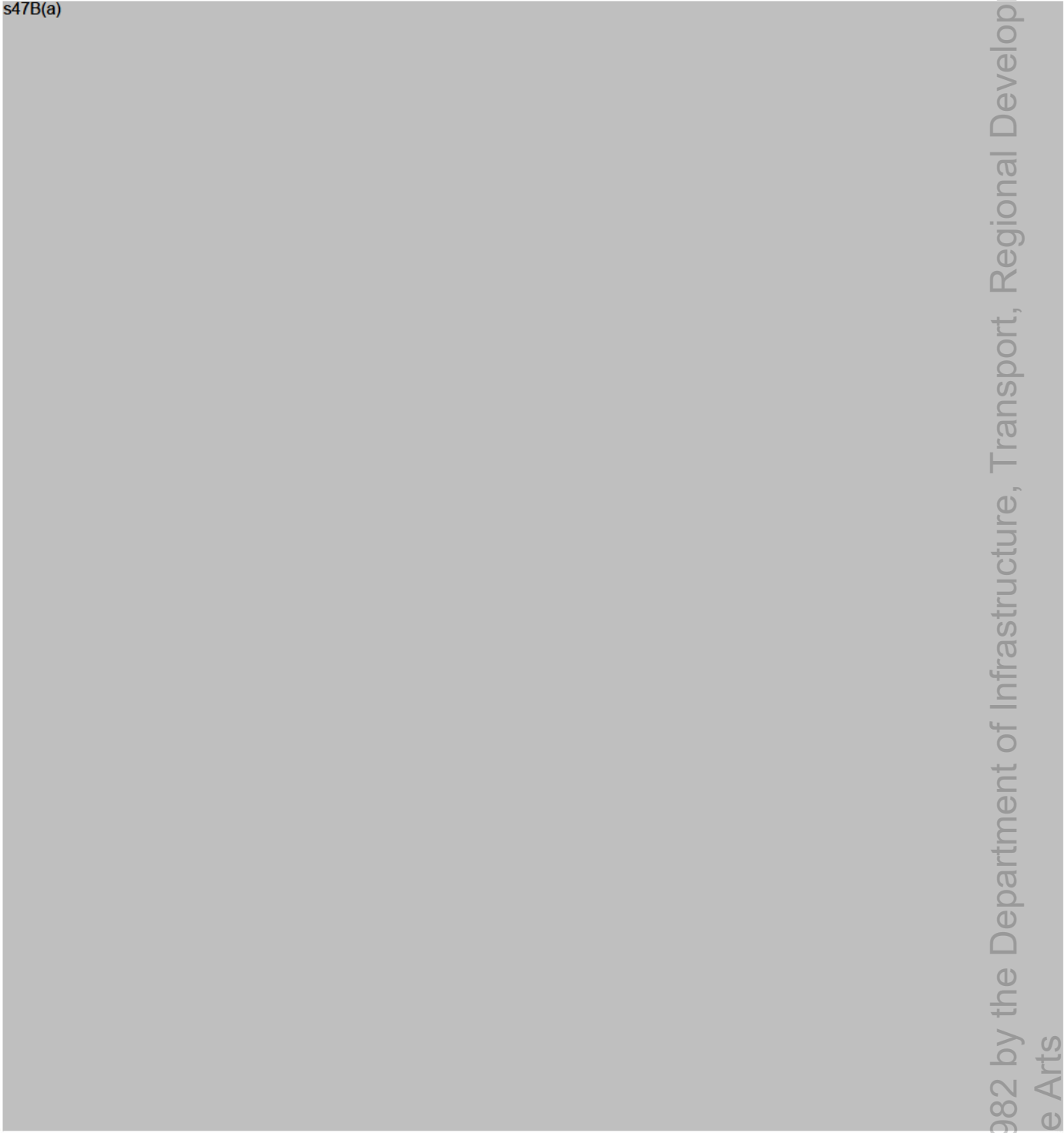
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Finding 3 The process used to develop the modelling presented in the DTP report appears sound and fit for purpose

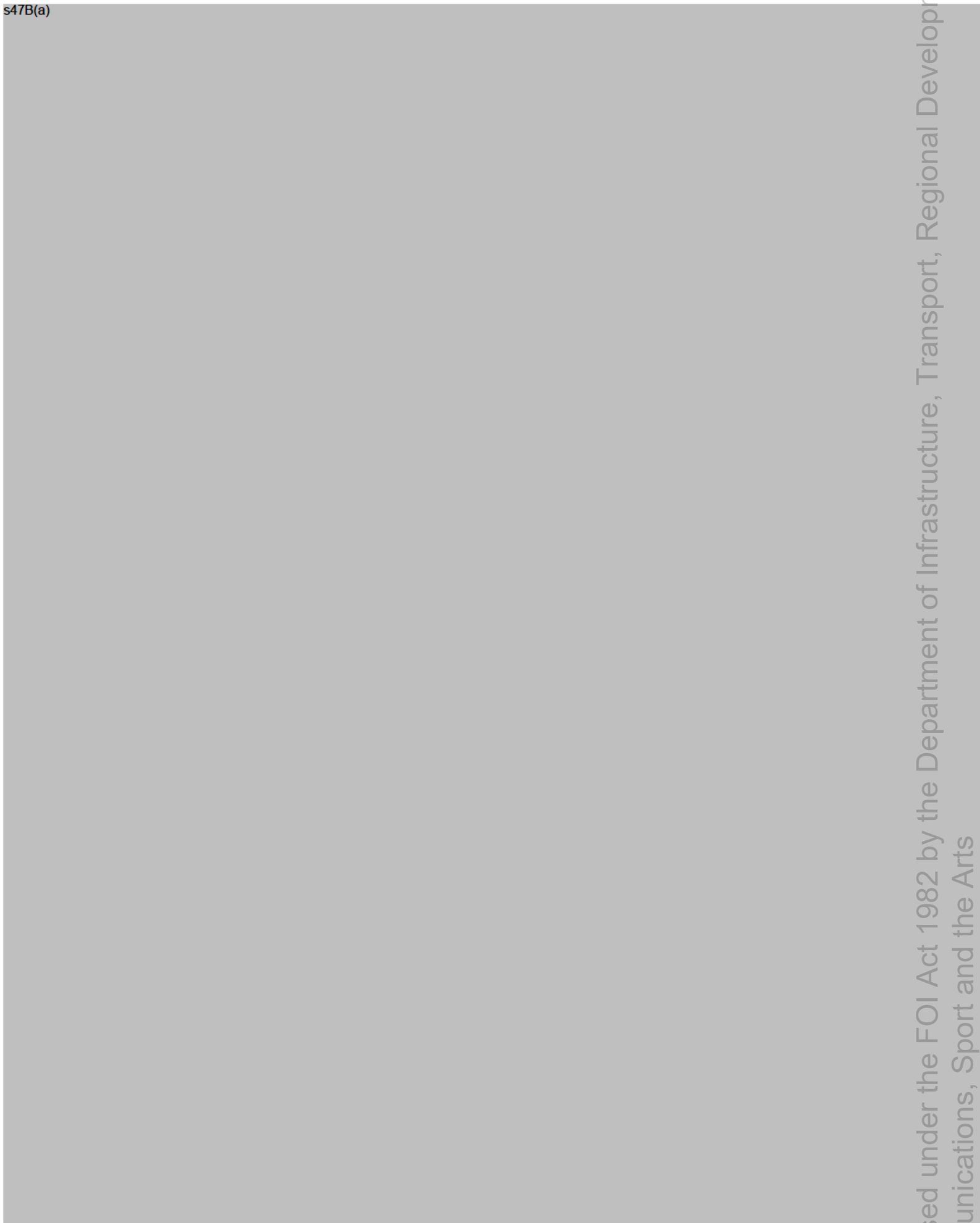
Overall ACIL Allen considers the work undertaken by DTP and KPMG to model future demand and capacity of the Tullamarine Freeway is sound and reflects usual practice for Victorian Government transport projects.

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Recommendation 1 Further data should be provided to support an assessment of the size and scope of the identified problem

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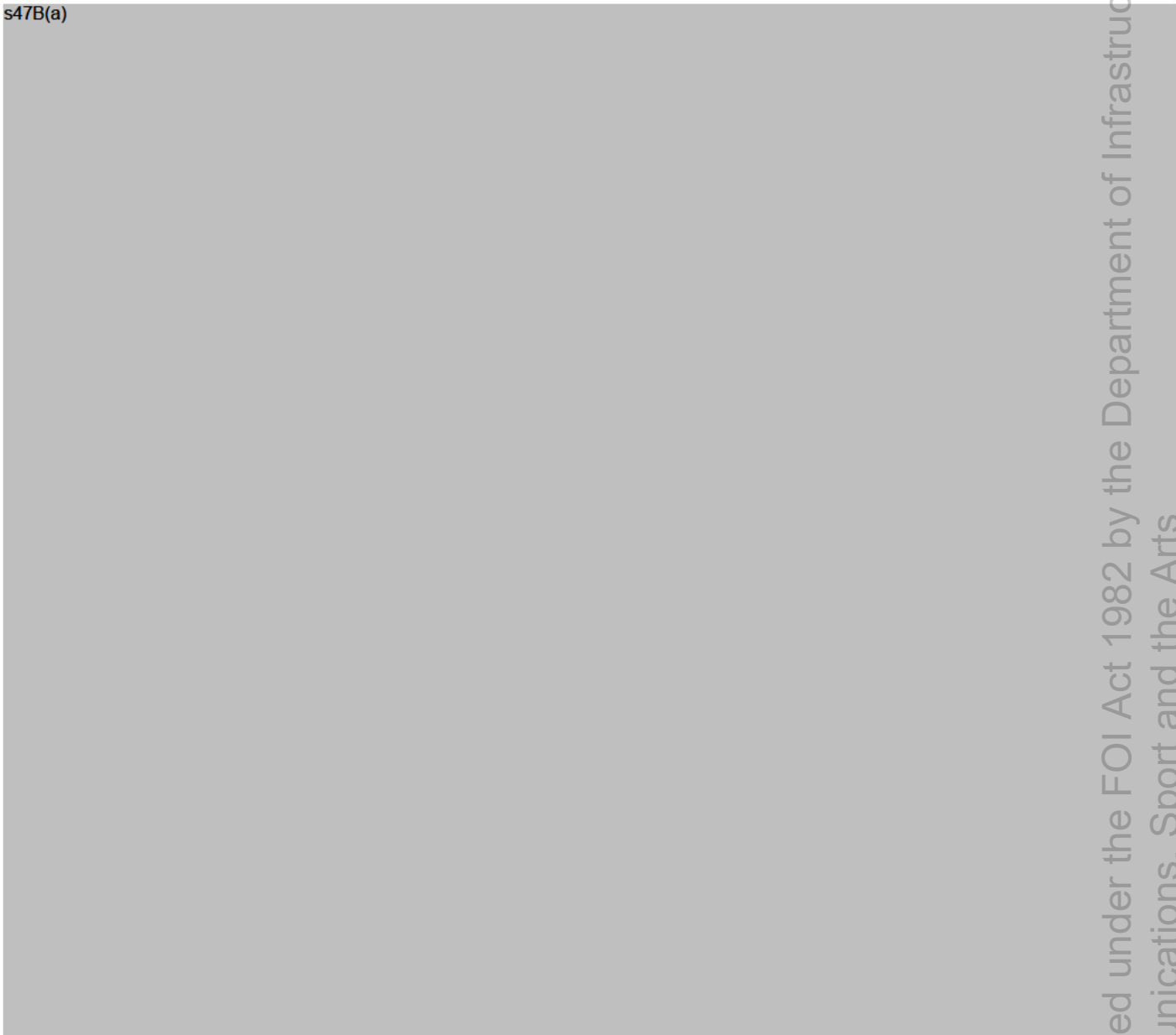
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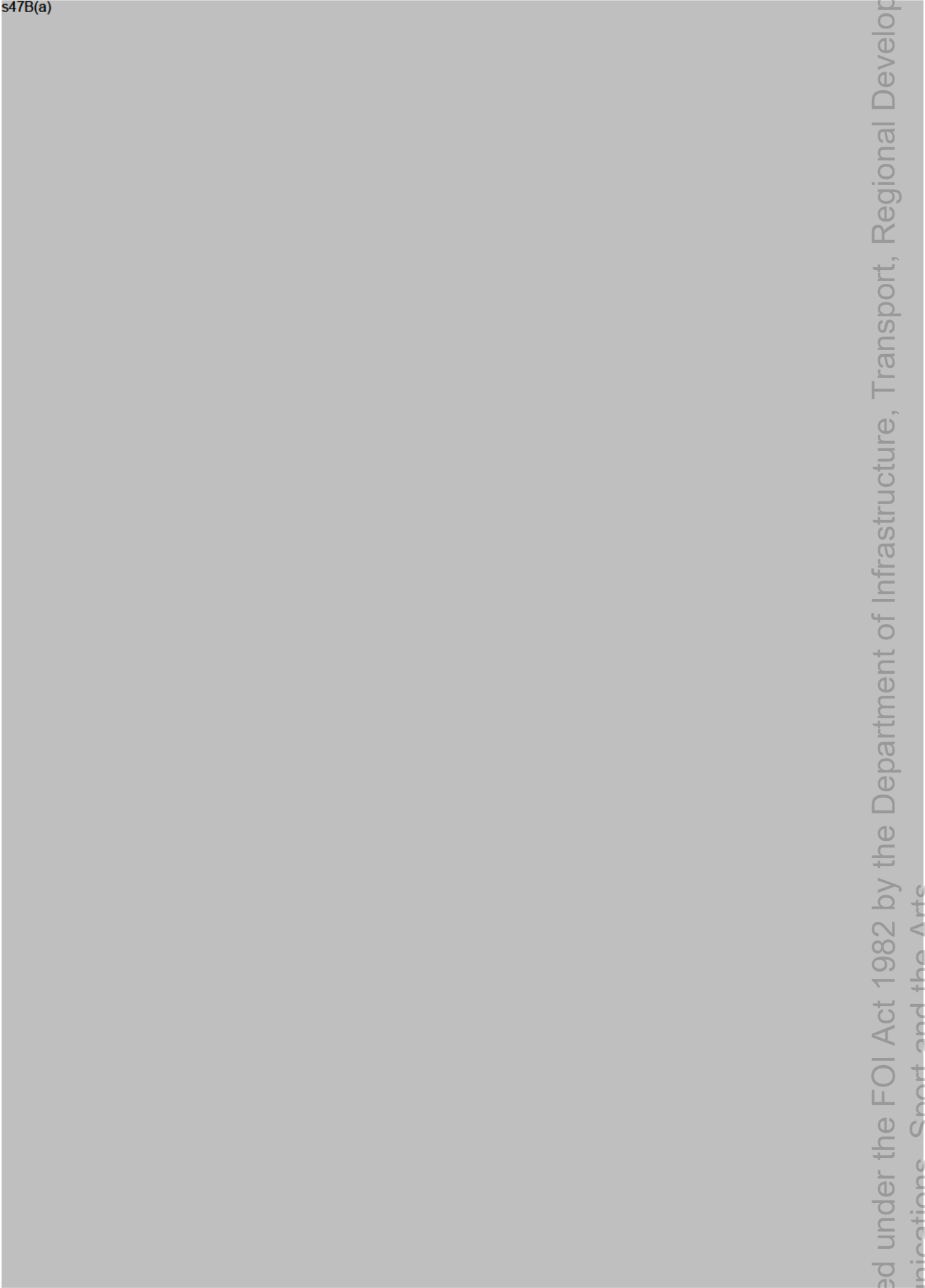
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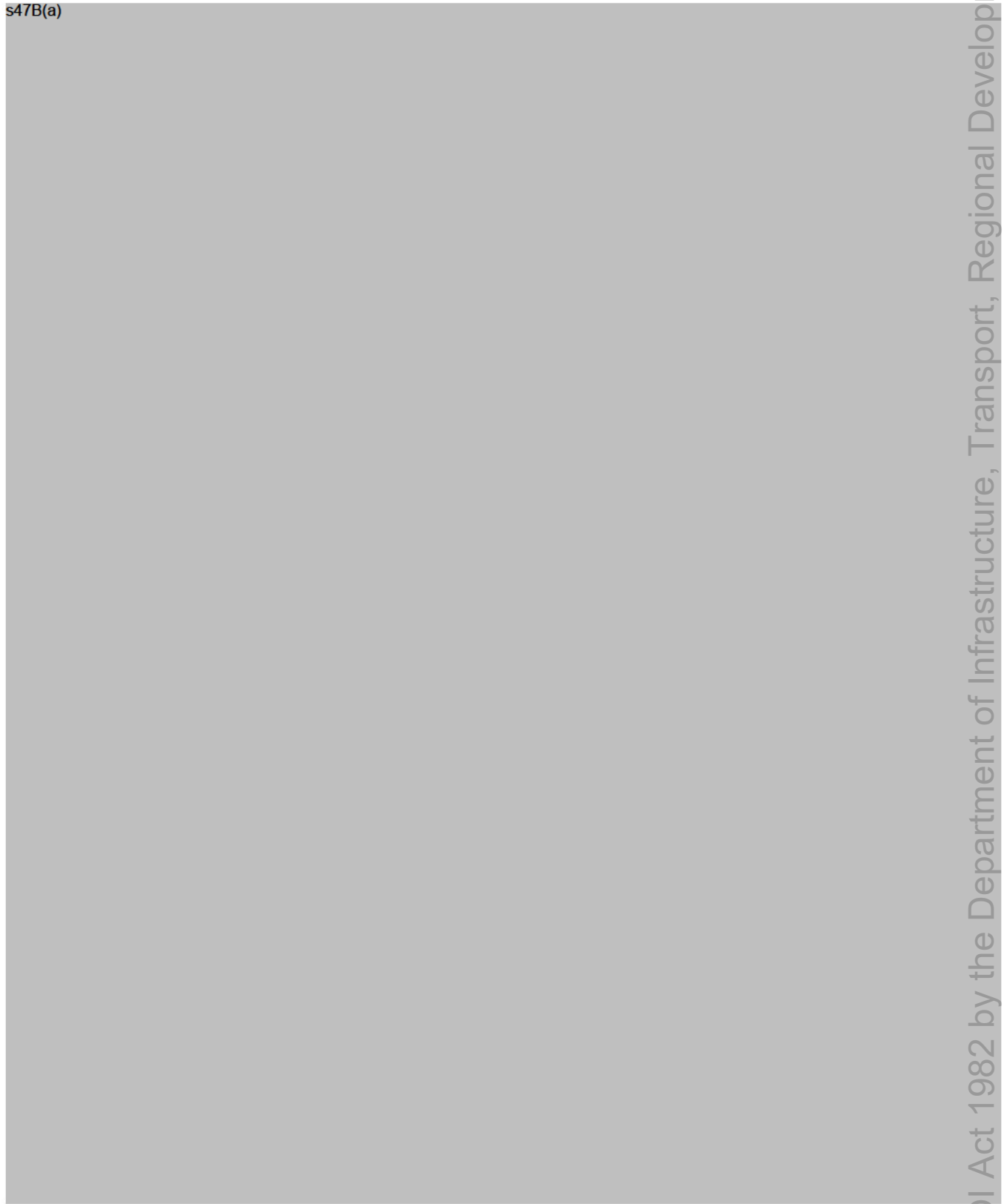


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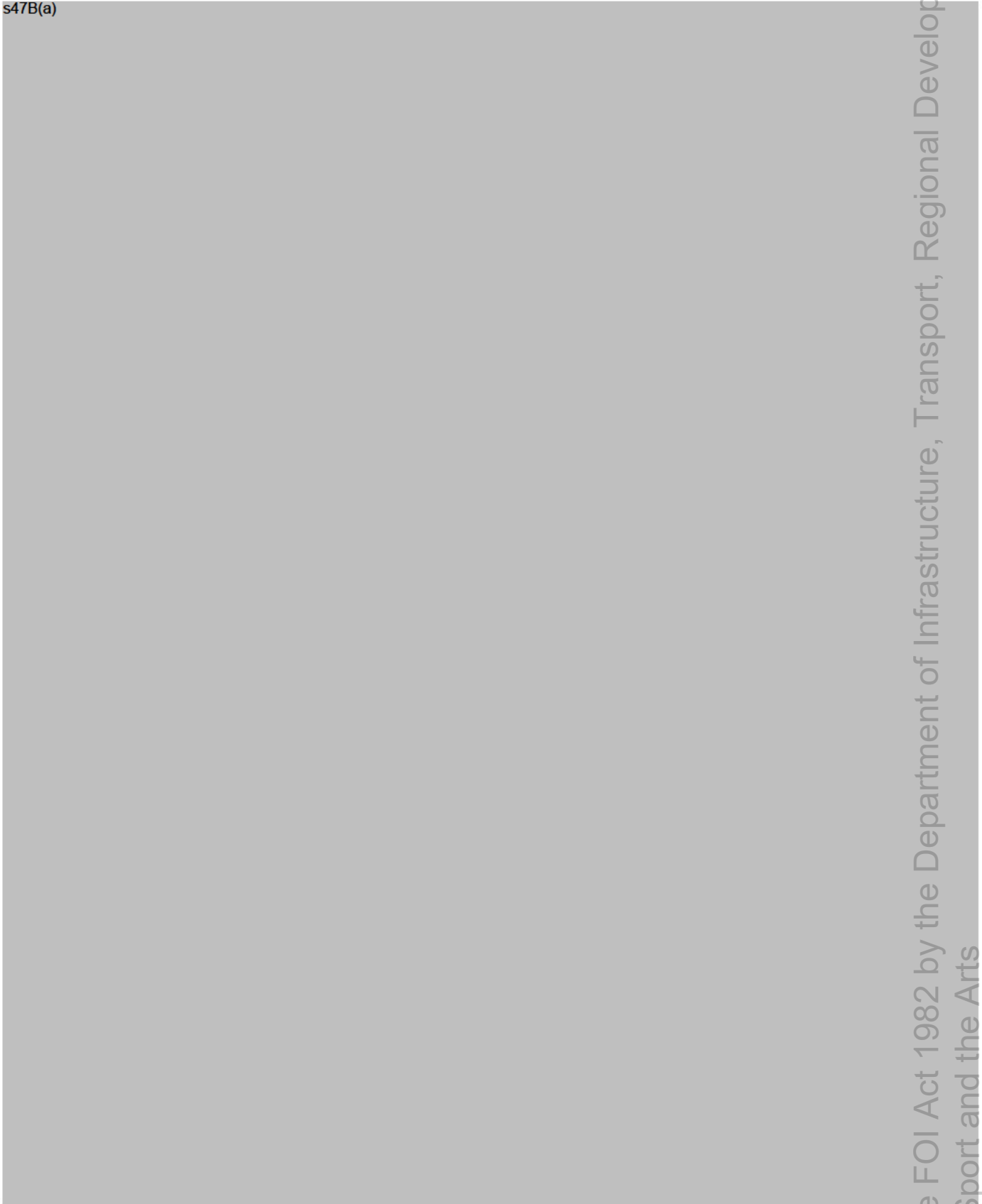
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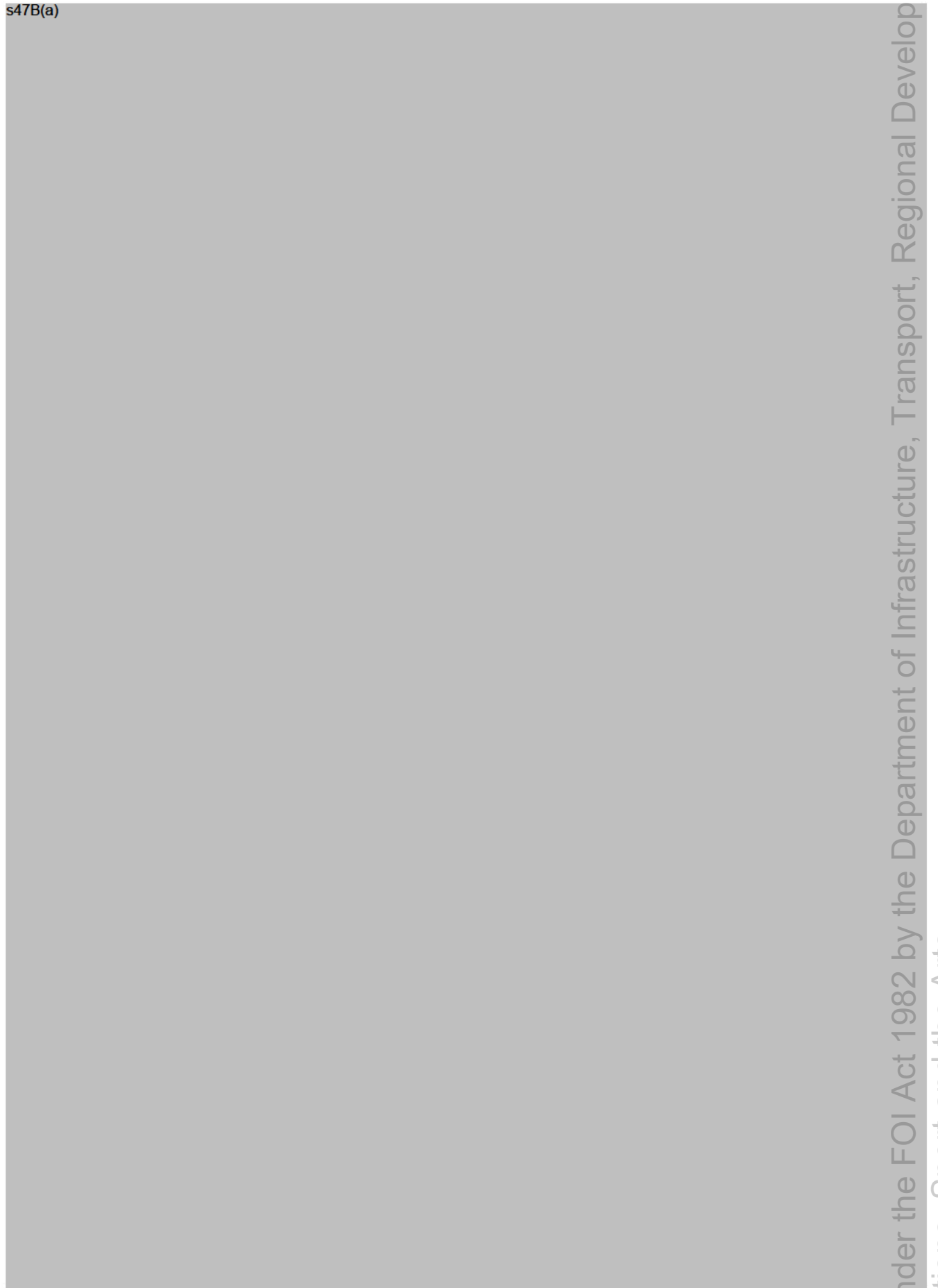
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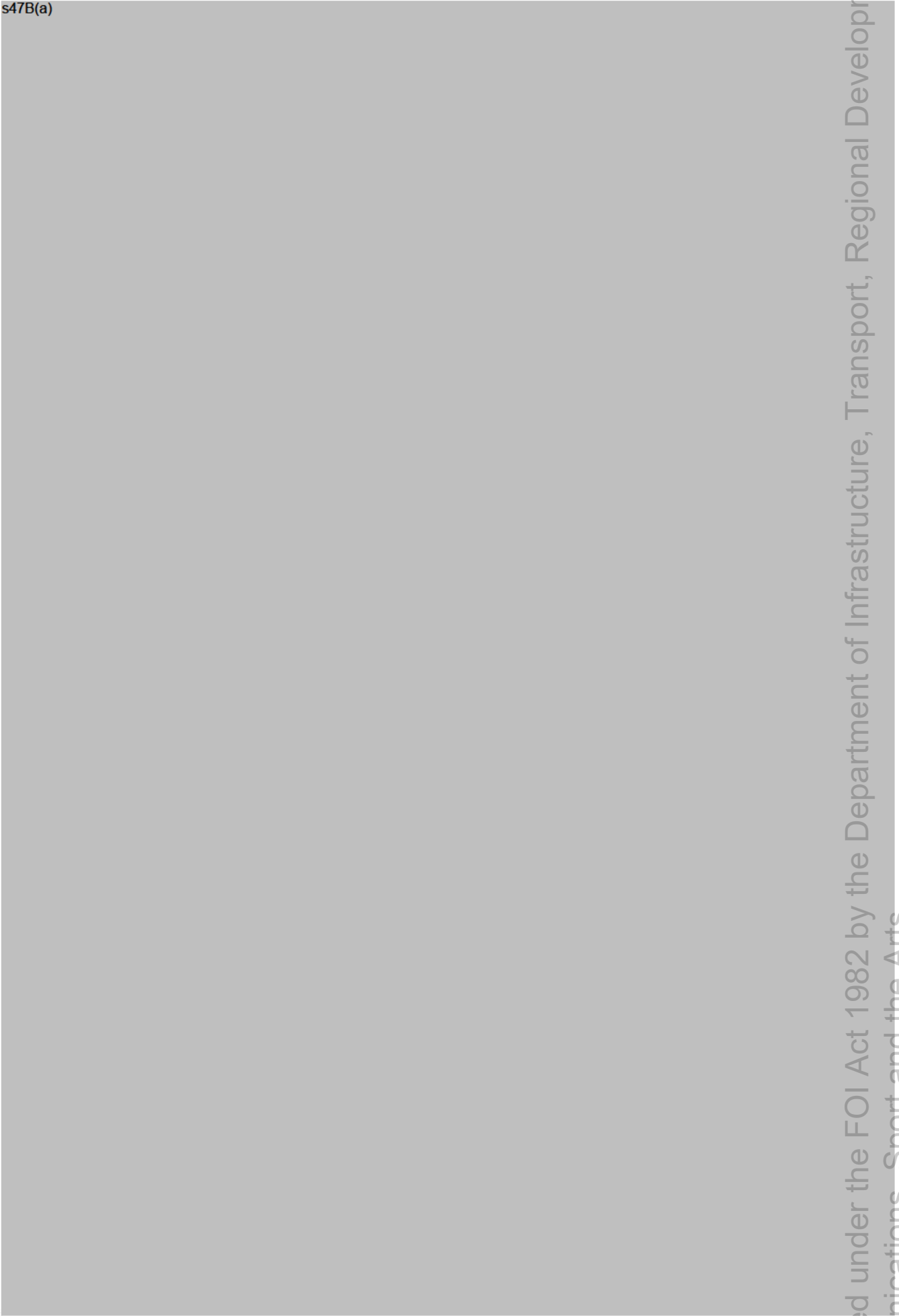
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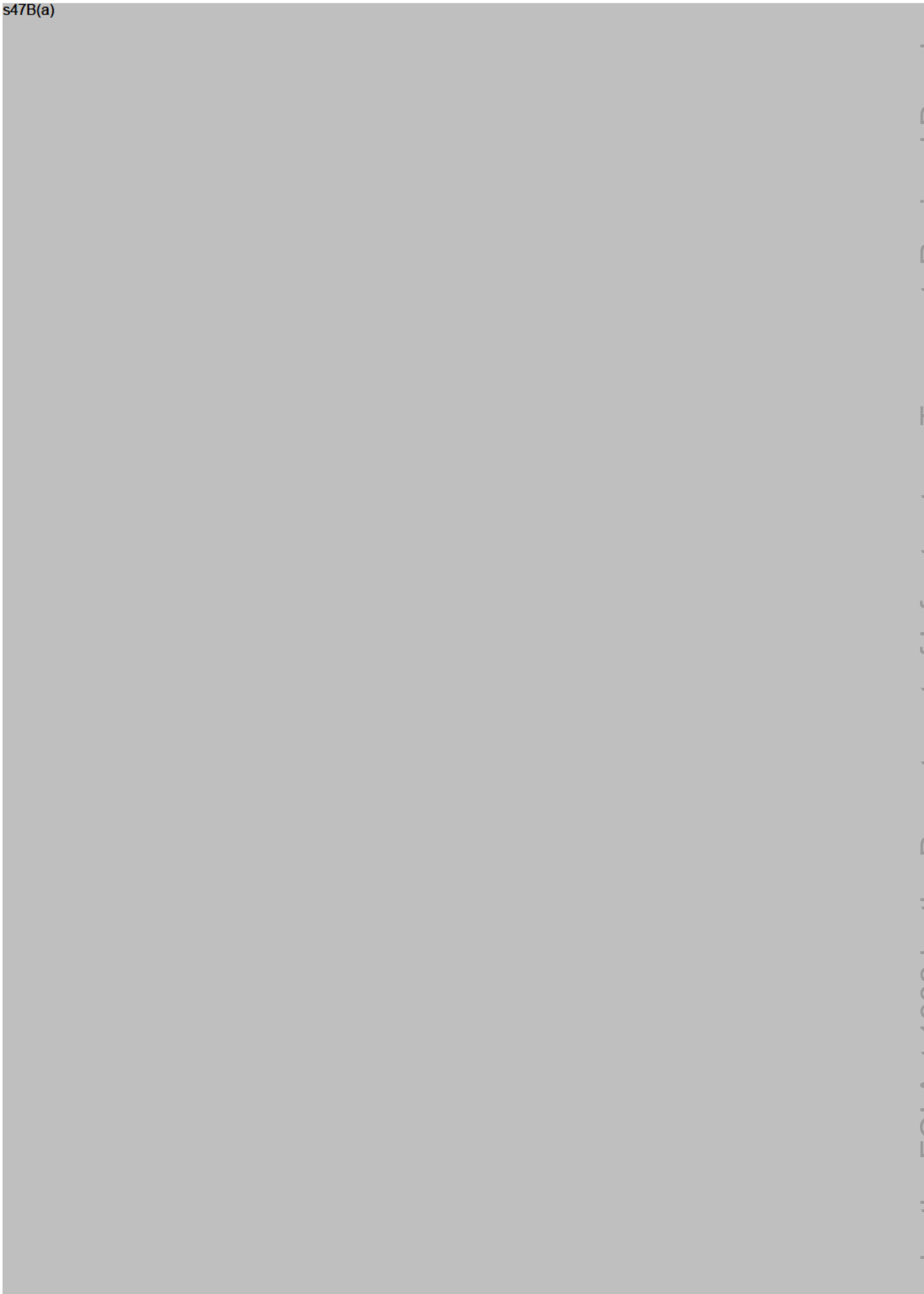


Recommendation 2 Review the economics of MAR as a solution to the Tullamarine Freeway capacity issue identified in the DTP/KPMG modelling

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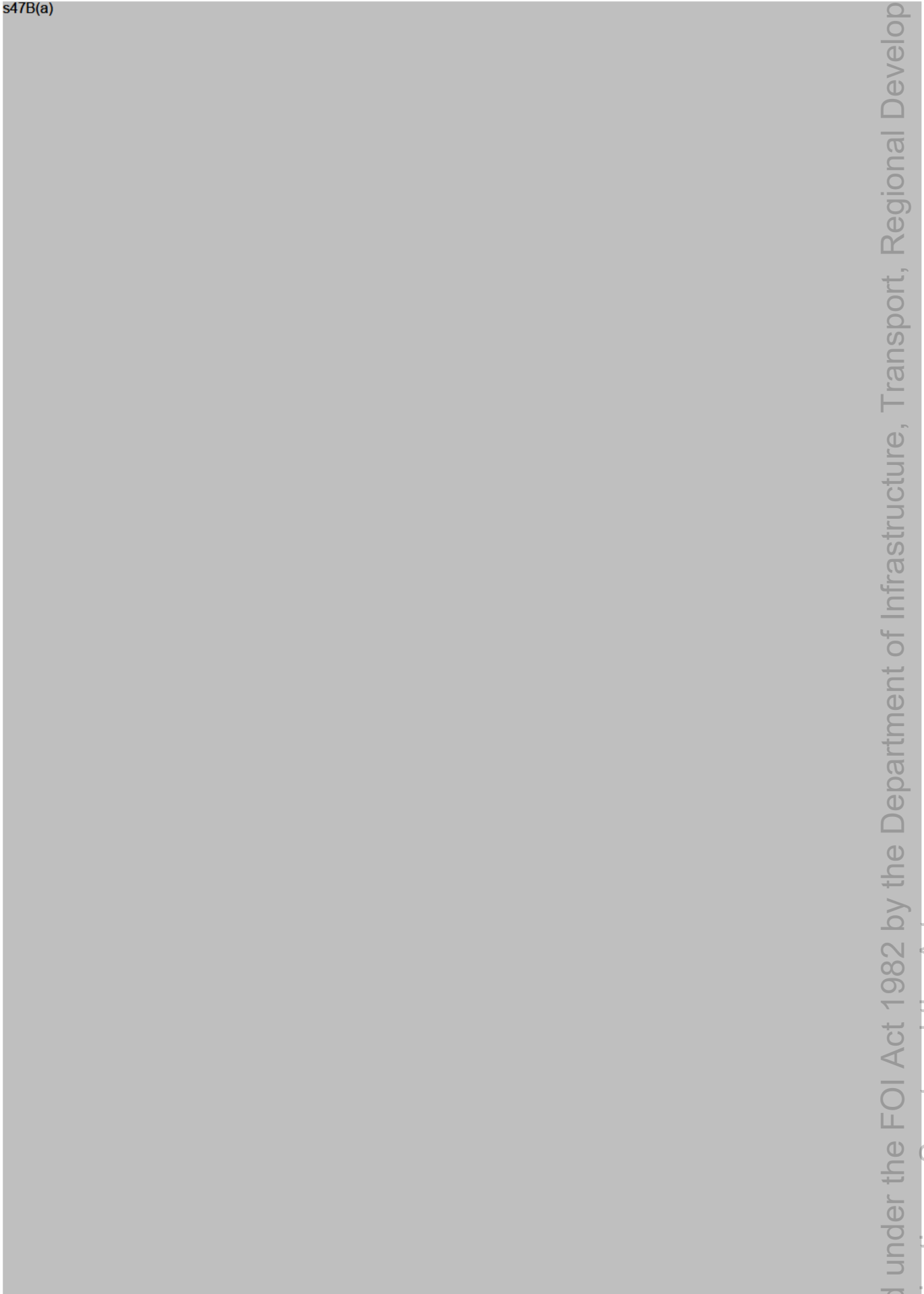


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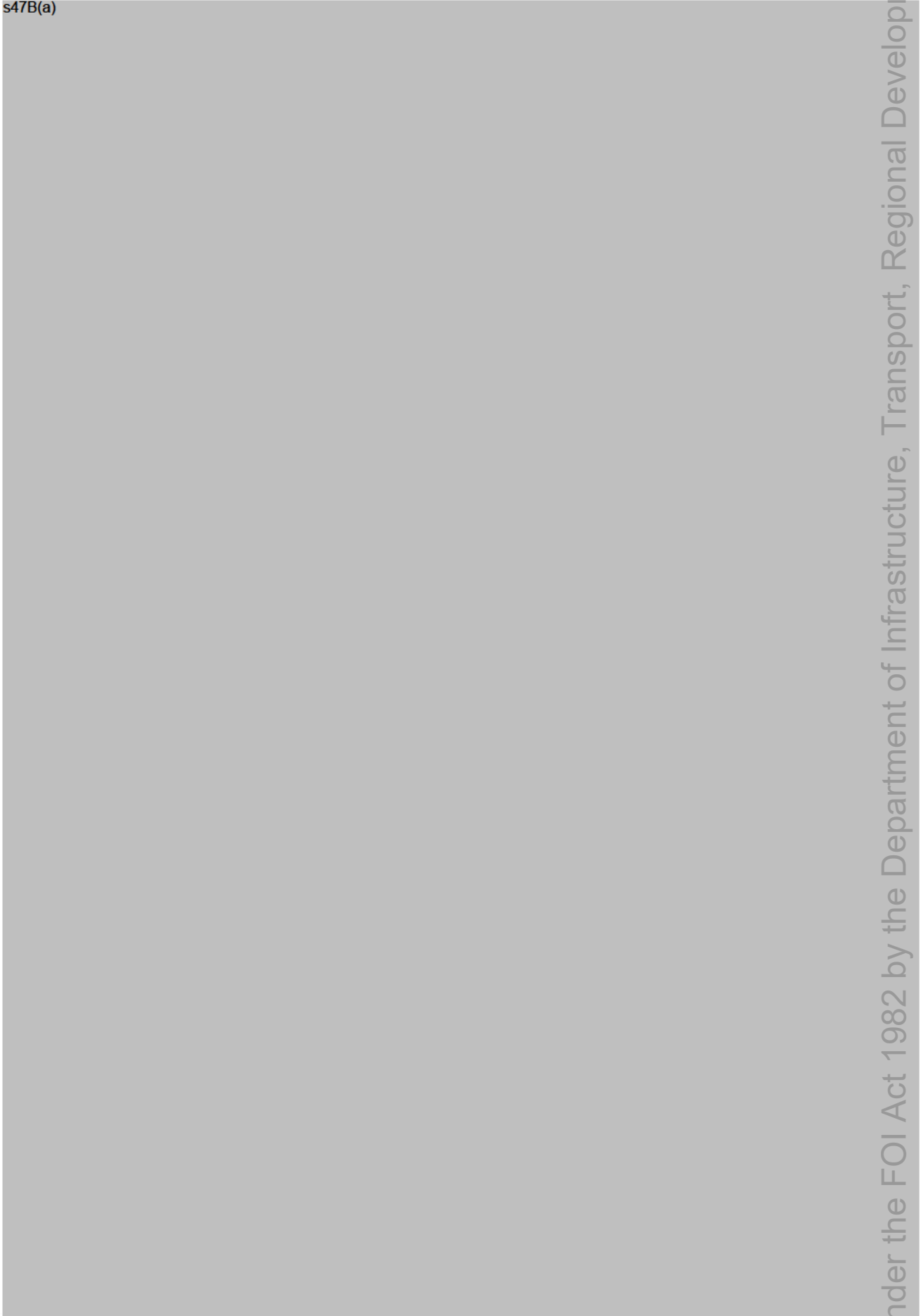


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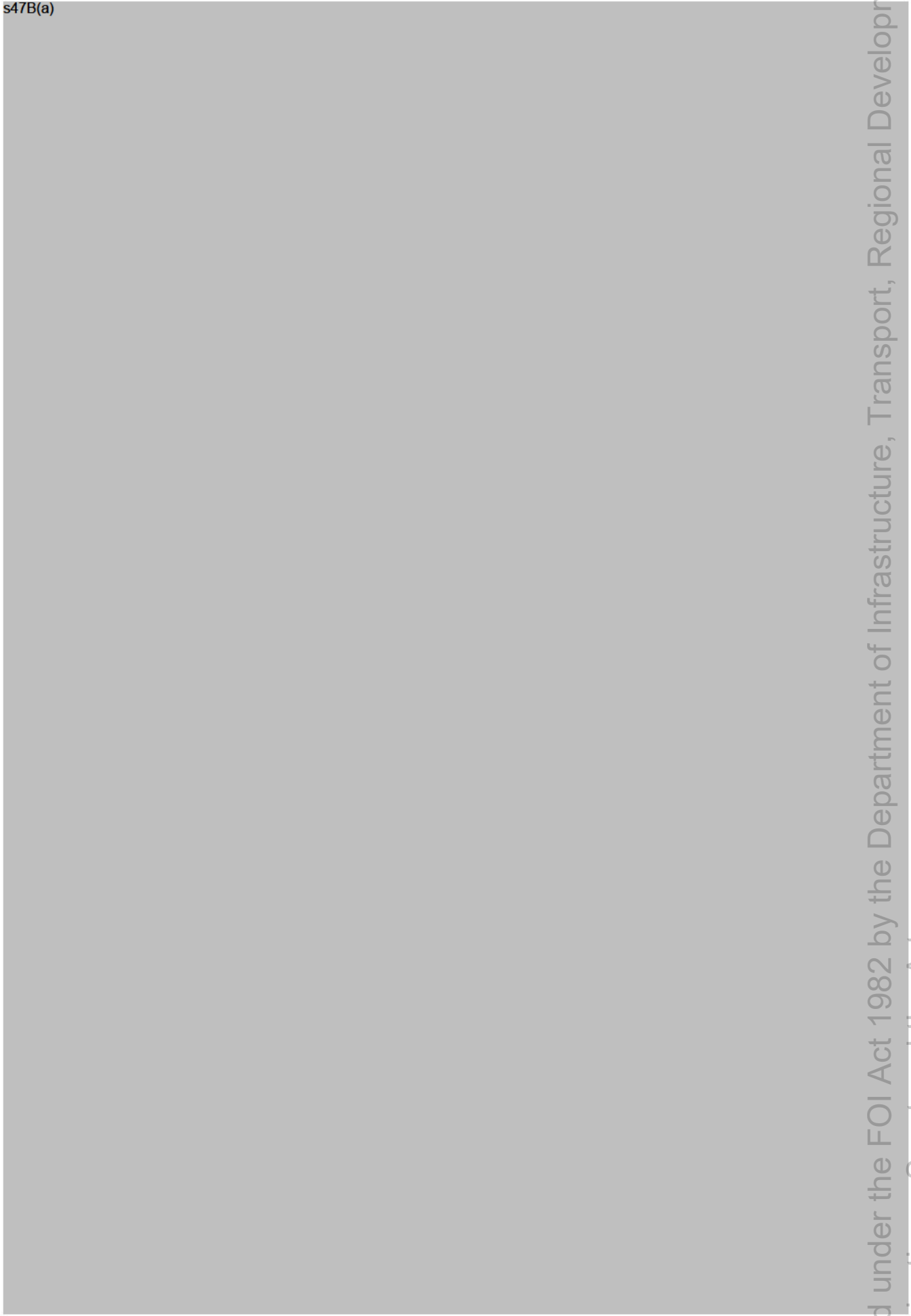


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Appendices

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A About ACIL Allen

ACIL Allen is Australia's most trusted independent economics, public policy and strategy advisory firm. As a firm, we specialise in economic analysis, and in understanding how policy decisions can translate into socio-economic outcomes. ACIL Allen has significant resources upon which it can draw. We employ around 60 consultants located in Adelaide, Brisbane, Canberra, Melbourne, Perth, and Sydney.

Our vision is to contribute to a better world by providing strategic ideas and advice in economics and public policy. This guides how we work with our clients to find opportunity and solutions in complexity. Our core offering is based on our Shared Values (Quality, Independent, Adaptable, Collaborative, Insightful) and our deep expertise in public sectors and markets in which we operate.

The firm has built a reputation for quality research, credible analysis, and innovative advice on economic, policy and strategic matters over a period of more than 30 years. ACIL Allen operates across a select range of industries including energy, mineable resources, water and other infrastructure, education, tourism, health and human services policy and provides specialist advice to companies, governments, regulators and industry associations. ACIL Allen has been at the forefront of analysis of changes and policy issues in these sectors. We have helped governments to develop a number of policy mechanisms applied in response to these changes and policy issues. We have also helped many private corporations to develop responsive business strategies in this dynamic environment.

ACIL Allen specialises in the analysis, development and evaluation of policy, strategy and programs. We leverage cooperation, teamwork, and the diversity of our people; and we trust our employees to be independent thinkers who provide frank and fearless advice. This combination of deep expertise and sophisticated and specialised quantitative and qualitative tools has supported ACIL Allen's reputation for quality research, credible analysis, and innovative advice over a period of more than thirty years.

Our analytical and modelling skills enable us to provide robust quantitative estimates of the impacts of market and regulatory risk. We often use risk-based decision tools such as real options frameworks to advise clients on risk management strategies and opportunities. In part, our experience in these roles relates to major infrastructure assets, supporting feasibility assessments, equity raisings, sale and acquisition processes and funding of infrastructure assets, including natural gas and electricity transmission and distribution systems, power stations, roads, railways, airports and ports.

Our consultants are drawn from a wide variety of disciplines including economics, finance, statistics, geology, physics, environmental science, engineering and mathematics. We also offer a diverse range of professional backgrounds in state and federal government, academia and business.

Further information can be found on ACIL Allen's website at www.acilallen.com.au.

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