Submitters Details:

Mahurangi East Residents and Ratepayers Association (MERRA)

Application Details:

Application Number: BUN60339589 on behalf of Waste Management NZ Ltd (WMNZ) to construct and operate the proposed Auckland Regional Landfill (ARL) at 1232 State Highway 1, Wayby Valley, between Wellsford and Warkworth, adjoining Dome Valley

Submission Details:

Our submission opposes the application *(in its current form)* **in two respects.**

Our principal submission is listed second below

The specific parts of the application to which my/our submission relates to are:

FIRSTLY: Assessment of Environmental Effects (AEE) Section 5.6 'Key Design Features of the Landfill'

MERRA submits **in support of others** whose submissions address the protection of local eco-systems from the risk of stormwater/leachate/sediment runoff (or associated landfill impacts) that could negatively impact local wetlands, streams, rivers and in turn the Kaipara Harbour (particularly in adverse climate or geological events). MERRA submits that Council must not issue consent unless it has 100% confidence (based on third party expert assessments and independent peer reviews) that the proposed design features will eliminate all conceivable risk to local ecosystems both during the operational life of the landfill and for the long post-operation risk period**.**

Note that: MERRA will defer to other submitters' representation on this matter. Accordingly MERRA **does not wish to speak** on stormwater/leachate issues at the hearing.

SECONDLY (this is MERRA's principal submission): AEE Section 9 'Assessment of Effects on the Environment' and AEE Section 12 'Consultation'

Specifically:

9.18 Traffic and particularly **9.18.2 Operational Traffic** (and particularly the conclusion that Traffic Impacts will be "no more than minor").

Also

12.7 Kiwirail Holdings Limited

12.16.1 Mahurangi East Residents and Ratepayers Association Inc.

<u>The reasons for our submission are:</u>

- The proposed ARL will have significant adverse traffic effects which the AEE has failed to adequately address.
- There has been little or no consideration of traffic and transport effects other than the ARL's immediate access to SH1. The AEE fails to address the broader environmental, safety and congestion impacts of the proposal. The AEE flies in the face of national and local policies, targets and guidelines[1].
- The conclusion that the traffic impacts are "no more than minor" is therefore incorrect (or at best unproven).
- The failure to consider the wider transport impacts means that the AEE has not adequately assessed alternative transport modes and mitigations, as required by the guidelines. Consideration of the most obvious alternative, waste by rail, is completely inadequate
- A more thorough assessment of the waste by rail alternative should be undertaken in light of more recent policy changes and investment decisions.
- Unless and until these deficiencies have been addressed, we submit that consent for the ARL should not be granted.

These matters are covered in more detail in our 'Submission Discussion' section and the Appendices that follow.

<u>The decision(s) we would like the Council to make are:</u>

1. Decline the application; or…
2. Impose conditions that require transport of waste by rail and/or limit the daily (and hourly) heavy truck movements[2] such that transport of waste by rail becomes integral to ARL operations.

<u>Submission at hearing:</u> MERRA confirms its wish to speak in support of its submission

<u>Signature of submitter(s) or agent of submitter(s)</u>

Stuart Windross (on behalf of the MERRA Committee)

[1] Auckland Transport's 'Integrated Traffic Assessment: Guidelines' 2015

[2] Heavy vehicle limits (such as already apply at Whitford landfill [AEE3.4]) could reduce over time, incentivising an increase in waste by rail volumes as rail capability and capacity is developed.

SUBMISSION DISCUSSION

This submission is presented by the Mahurangi East Residents and Ratepayers Association (MERRA)

MERRA[3] represents residents for whom SH1 is a critical link to essential services such as hospitals, airports, and many of the services, events and facilities Auckland City and its Council provide for ratepayers. MERRA works closely with Auckland Council on environmental projects. Our residents and ratepayers wish to see Council's regulatory decisions align with its stated positions on climate change, congestion and road safety.

Please note: MERRA met with WMNZ in February 2019[4] to discuss its concerns regarding the potential effects of the ARL (particularly on State Highway One (SH1) traffic) and discuss MERRA's waste by rail proposal[5]. This in turn instigated on-going dialogue between WMNZ and Kiwirail (see AEE 12.7) and MERRA (see AEE 12.16.1). There has been significant local press coverage and support of MERRA's position.[6]

MERRA submits that the proposed ARL will have significant adverse traffic effects which the AEE has failed to adequately address.

1) Increased Traffic Movements:

If approved as proposed, the ARL will generate a huge 740+[7] extra vehicle movements per day on SH1 and through the notorious Dome Valley. As WMNZ's own Integrated Traffic Assessment ([ITA]; Technical Report M) admits with regard to Dome Valley, "this stretch of road has a notable number of crashes."

Well over 520 of these movements (most ex urban Auckland) will be diesel powered heavy vehicles, many carrying bulk waste from transfer stations. Each round trip will be approximately 120 kilometres (conservatively modelled on travel from Auckland City's northern urban fringe at Albany to the proposed ARL site).

MERRA calculates that ARL operations will deliver a 60% increase over current heavy vehicle counts in the Dome Valley (for further detail and calculations see Appendix 2, 2.2).

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[3] For more detail regarding MERRA constitution as an incorporated society see https://scottslanding.org/merra/

[4] Notes from the meeting (mutually verified) can be tabled on request.

[5] MERRA had posted its position paper on line and invited WMNZ to consider it prior to the meeting (see https://scottslanding.org/wp-content/uploads/2019/03/MERRA-Waste-by-Rail-to-Dome-Valley-case-revised.pdf

[6] See for example: https://www.localmatters.co.nz/news/31702-push-rail-service-to-proposed-landfill.html and https://www.stuff.co.nz/business/111235239/moving-waste-by-rail-proposed-by-residents-concerned-about-dome-valley-landfill-traffic and https://www.localmatters.co.nz/news/34955-100-million-northern-railway-upgrade-spurs-controversy.html

[7] Figures from Waste Management consent application documents. Earlier WMNZ estimates were c900 movements.

2) Increased Greenhouse Gas Emissions:

MERRA estimates a daily diesel fuel burn in excess of 14,000 litres (producing almost 38 tonnes of Co2 emissions) from ARL heavy vehicle movements (see Appendix 3 for detail and calculations)

3) Increased Traffic Congestion:

The potential impact of these movements on SH1/Dome Valley traffic congestion (particularly over summer peaks) is not assessed (see Appendix 2, 2.3-2.5).

The potential impact of these movements on road safety and accident rates are also not assessed (see Appendix 2, 2.3 and Appendix 3)

ARL heavy traffic volumes and their associated adverse effects are projected to grow over time. MERRA submits that the growth estimates presented in the AEE are overly conservative, for the following reasons:

- the ARL may become truly 'Regional' (as its name implies) over time as other landfills fill up or consents expire
- international markets for recyclables may continue to shrink
- new landfills will become more difficult to establish
- other centres' waste streams may be added
  (For more detail and sources see Appendix 2,2.1)

The AEE's predominant focus on the impact of the proposed ARL roundabout means it fails to adequately assess the wider traffic volume/congestion and emission impacts of the ARL's operational traffic.

MERRA submits that the AEE's failure to address broader environmental, safety and congestion impacts flies in the face of national and local policies, targets and guidelines.

In particular:

- New Zealand's commitment to reduce greenhouse gas emissions by 30 percent below 2005 levels by 2030 under the Paris Agreement on Climate Change.
- Auckland Council's declaration of a Climate Emergency (11 June 2019) *"By unanimously voting to declare a climate emergency we are signalling the council's intention to put climate change at the front and centre of our decision making," says Mayor Phil Goff*
- Auckland Council's 'Low Carbon Strategic Action Plan' which *'aims to reduce overall emissions by 40 per cent by 2040'*
- Auckland Transport's Road Transport Management Plan which focuses on addressing increases in road trauma, freight network congestion and greenhouse gas emissions (40% from road transport).
- Strategic priorities in the Government Policy Statement on Land Transport which include safety, improving freight connections, and environmental sustainability *('increasing movements of freight by lower emission transport modes, such as rail and coastal shipping, will reduce emissions and pollutants').*
- Auckland Transport ITA guidelines[8] (that require a holistic assessment of traffic impacts referencing policies and targets such as those indicated above)

[8] Auckland Transport's 'Integrated Traffic Assessment: Guidelines' 2015

There is a clear discord between the ARL's traffic impacts and fundamental policy settings. This is masked by a Traffic Assessment that is too narrowly focussed, and simply fails to consider all of the matters that need to be addressed.

As detailed in Appendix 5, the Integrated Transport Assessment (ITA) provided as Technical Report M fails to assess traffic impacts as broadly and holistically as Auckland Transport ITA guidelines require.

MERRA submits that this inadequate assessment means that it is impossible to conclude that the traffic impacts of the proposal are "no more than minor".

Judged against the broader policy imperatives outlined above and Auckland Transport ITA Guidelines, our submission is that this conclusion is incorrect, or at best unproven.

MERRA submits that the AEE fails to consider Alternative Transport Modes as required:

Failure to consider the wider transport impacts means that the AEE also fails to adequately assess alternative transport modes and mitigations, as required by the guidelines. There is very little discussion or assessment of alternative transport options.

Consideration of the most obvious alternative, waste by rail, is rudimentary at best.

As a result, the option of transporting Auckland's waste to the ARL by rail is prematurely 'parked' by the application [see 12.7].

MERRA submits that WMNZ needs to redress the omissions and opportunities missed in its application in relation to transporting waste by rail.

The AEE should include a more holistic assessment and analysis that more rigorously examines the opportunities offered by the waste by rail.

This in turn should shape the form and function of waste by rail as an alternative transport option.

The sources and proposals included in MERRA's detailed 2019 position paper[9] (see Appendix 1) may offer a valuable source. Key considerations include:

- The mothballing of the Warkworth to Te Hana motorway project means the slow and historically dangerous Dome Valley section of SH1 will remain in use for the foreseeable future.
- Waste is an ideal and cost effective rail cargo; easily containerised, single point discharge, standardised weight/texture, non-time-critical (ie: could travel outside commuter peaks and at night and prove an ideal 'back-load').
- There is a potentially suitable rural site for a bulk bin-transfer siding at the former station yard on Wayby Station Road. There is also potential for a connection to the ARL via an upgrade of Wayby Station Road, a private road or a short spur line.
- The former station yard is under 3km[10] by road from the proposed ARL and thus within easy reach of the electric shuttle trucks Waste Management proposes to use to move waste on site.

[9] Labelled as 'well-structured' and constructive by a WMNZ representative in a meeting with MERRA.
[10] See Appendix 6 for a map showing distances

- Research such as that contained in MERRA's 2019 Position Paper (see Appendices 1 and 3) that shows rail can deliver:
    - Up to 80% saving in C02 emissions
    - 95% reduction in accident rates/fatalities over road transport
    - One train removing 50+ heavy vehicles from the roading network and its congestion equation
    - "rail offers cost-effective waste transportation to local authorities faced with looming Government environmental and recycling targets" (eg London, Seattle).

MERRA is concerned that, despite some "rail-leaning" statements in the AEE, the application only pays lip-service to the potential for transporting waste by rail.

The AEE states that *"WMNZ and KiwiRail will continue to work together in future to identify opportunities to explore waste by rail"* (12.7) and *"WMNZ confirmed that they were committed to considering rail as a future option should this be available."* (12.16.1). However, the waste by rail option is effectively parked on the basis of January 2019 statements from Kiwirail that suggest a puzzling reluctance to explore commercial opportunity and options.

MERRA submits that the situation regarding the viability of a waste by rail transport option has materially changed since the AEE was completed, and needs to be re-evaluated.

We note:

- the additional $109m upgrade of the North Auckland Rail Line (NAL) confirmed January 2020 supersedes much of the January 2019 Kiwirail position outlined in AEE 12.7. (see Appendix 4)
- Kiwirail's need to deliver its Government/public shareholders a commercial return on the NAL investment. A review of its 'point to point' freight restriction is vital if Kiwirail is to secure landmark commercial opportunities such as waste by rail.
- the Upper North Island Supply Chain Working Group's (UNISCWG) Report (and follow-up reports that are due in May 2020) including proposed inland freight hubs, double tracking etc (see Appendix 4).
- Government's proposed programme of post-Covid 19 'Shovel Ready' infrastructure project opportunities. For example a Council-supported NZTA, WMNZ and Kiwirail proposal might deliver funding for related rail improvements such as 'road to rail' transfer stations closer to waste sources and/or a siding on the Kiwirail land at Wayby Station Road and a related connection corridor.

MERRA submits that Kiwirail and WMNZ's postions have converged to the point that rail is more viable as an ARL transport option:

It is evident that many of the justifications behind Kiwirail's strangely reluctant former stance (AEE 12.7) have evaporated with the January 2020 $109m upgrade announcement.

As Kiwirail itself now proclaims, "(The upgrade) *…ensures the Northland Line will remain in operation long-term and also sets a solid foundation for KiwiRail to grow our freight services in and out of Northland, helping taking heavy trucks off the region's roads…. rail is a crucial part of developing an efficient, integrated road-rail transport system in the region."* (see Appendix 4)

Further to WMNZ's 'rail leaning' AEE statements, MERRA notes that as of January 2019 they were open to a rail transport option for the ARL from 'Day 1'. *"WM had not ruled out a rail option. If a possibility could be worked up … they would certainly include it. It could be a start-up option or one to be transitioned into post-2026".* [11]

Timelines:

Kiwirail has stated that "*the Northland Line is expected to be able to carry hi-cube containers*[12] *between Whangarei and Auckland by the end of September 2020, with all work on the line expected to be completed in 2021*" (see Appendix 4)

WMNZ in its discussions with MERRA has described previous planning for a rail option (including development of specialised bin-handling rolling stock).

Timelines and a lead time of 6-8 years before ARL operations scale up are favourable for a waste by rail option.

In summary MERRA submits that the much under-used Auckland to Whangarei (NAL) rail line (2km from site[13]) **offers a cost-effective alternative transport option well aligned to Government and Council policy/plan positions on congestion minimisation, C02 emission reduction, and road safety.**

Conclusion:

MERRA (and its wider community) views this consent application as a test of Council's commitment to its own widely stated principles on the environment, road safety and traffic congestion.

By requiring an ARL waste by rail transport alternative as a condition of consent (perhaps incentivised by a daily limit on heavy vehicle movements[14]) Council can deliver a saving in Co2 emissions of up to 80%, decrease road safety risks by up to 95%, and remove hundreds of heavy vehicles daily from the SH1/Dome Valley congestion equation.

Auckland Council can also make a very symbolic statement for the future of Auckland and the planet.

MERRA's case is that an ARL waste by rail alternative is both desirable and increasingly very viable.

We wish Council well in its consideration of this submission and its wider deliberations on the application.

[11] Notes from the MERRA/WMNZ February 2019 meeting (mutually verified) can be tabled on request.
[12] And Waste Management's bulk waste bins
[13] As the crow flies; see Appendix 6
[14] As currently applies at Whitford landfill (see AEE 3.4)

APPENDIX 1: MERRA's ORIGINAL POSITION PAPER

See:

1. https://scottslanding.org/merra-advocates-waste-by-rail/
2. https://scottslanding.org/wp-content/uploads/2019/03/MERRA-Waste-by-Rail-to-Dome-Valley-case-revised.pdf

APPENDIX 2: TRAFFIC PROJECTIONS AND TRAFFIC EFFECTS

2.1: Traffic growth: ARL vehicle numbers are forecast to grow through to 2060. MERRA notes potential for growth to be more rapid than the AEE forecasts as:

- International markets for recyclables may continue to shrink (see for example https://www.bloomberg.com/quicktake/recycling-crisis)
- existing alternative Auckland landfills fill up and/or consents expire[15]
- finding suitable sites for new landfills become more difficult
- consenting becomes more onerous due to more stringent requirements and greater public opposition
- other centres' waste streams are added[16]

2.2: Increase over current heavy vehicle numbers: Projected ARL heavy vehicles (particularly those doing bulk line-haul from WMNZ waste transfer stations) will run seven days a week all year. At peak times on average this will mean 110 movements per hour or almost one additional truck every thirty seconds past a given point (eg: on SH1 in the Dome Valley)[17]. We estimate based on WMNZ and NZTA's own figures that the proposed landfill traffic will result overall in a >**60%** increase to current daily heavy vehicle counts in the Dome Valley[18].

We note the suggestion in the application that there may be some bulk line-haul activity at night. However, despite vague commentary about extended access hours and night haulage, the ITA and AEE contain no modelling of, nor firm commitment to, congestion mitigation by phasing.

In the absence of any firm commitments or phasing plan, MERRA sees a risk that this gesture at mitigation will be diluted by client demand patterns, driver employment contracts, driver work preferences, consent or unitary plan restrictions at point of origin etc. There is no discussion or clarification of these risks.

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[15] Whitford Landfill (traffic limited in conditions of consent) is consented until 2041, Hampton Downs Landfill is consented until 2030.

[16] Eg: WMNZ with Thames/Coromandel, Whangarei

[17] Again WMNZ's own figures project c 110 additional vehicle movements in the morning peak alone. However bunching of movements is likely due to independent contractor work preferences, client demand, noise or movement restrictions at pick up points, and traffic/congestion patterns

[18] Current Dome Valley heavy vehicle counts are c1000 per day with c1400 projected for 2025/6 (NZTA). The addition of 520 heavy waste carriers and say 100 other non-waste trucks (a conservative proportion of the other 220 service vehicles and c40 logging trucks): 620/1000 = 62%

2.3: Effects on traffic congestion especially over summer/holiday peaks: MERRA vehemently disputes that the effect of a 60% increase in heavy vehicle counts is 'no more than minor'.

As locals familiar with SH1 traffic patterns across the year we make a clear distinction between traffic volumes and congestion. Additionally we challenge the accuracy of the baseline traffic volume figures used in the report to discuss traffic impacts on numerous grounds. For example:

- There is a focus solely on vehicle counts which are not an accurate indication of congestion as reflected in delays/journey time
- The ITA's baseline 'near-site' traffic data are inexplicably based on traffic counts taken in October when traffic volumes are far lighter than most other times of the year
- The ITA's attempts to extrapolate peak Friday afternoon/summer traffic volumes employ NZTA count data taken on the other (North) side of Wayby Valley Rd (a turn off used heavily by weekenders and holiday-makers heading towards the popular Mangawhai/Lang's Beach area). We therefore suspect that the resultant '+16%' adjustment applied to the October data seriously under-estimates seasonal peak time numbers at the proposed ARL site.
- This error is likely compounded by the focus on vehicle counts, without reference to journey/delay times. By definition vehicles stuck in heavy traffic will move far slower at peak times and counts will be reduced accordingly in a given timeframe. At peak times vehicles will also tend to use alternative routes (eg SH16 to Wellsford); something that may significantly change with the opening of the Puhoi to Warkworth motorway.
- There is no attempt to model the impact of the new Puhoi to Warkworth motorway on traffic numbers reaching the Dome Valley more easily and quickly from 2021 nor a potential change in SH1-SH16 balance. Accordingly we question the '+3% annually' straight line projection used.
- There is no attempt to model the impact of Dome Valley safety improvements on traffic flows or the repercussions of an accident. Will it be safer but slower? How will the 60% increase in heavy vehicles affect flows once passing bays are removed? Will the safety barriers and other measures mean that accidents will be more difficult to access and clear? What are the scenarios when detours are required?

2.4: Increased congestion as a result of the new ARL entry roundabout:

MERRA notes the admission in the ITA (p.11) that ARL's new roundabout modelling data shows *"some queues of slow moving or stationary vehicles are generated on the through movements along the SH1 approaches to the roundabout…* (and that a)… *notable queue is likely to form northbound on SH1 in both evening peaks of the future years".*

MERRA argues that this is unacceptable for a new installation on SH1 (especially in such a 'sensitive' section) and a further reason why a waste by rail alternative should be a condition of consent.

2.5: Acknowledgement of congestion on SH1:

In contrast to its failure to address existing SH1 congestion elsewhere in documentation, the ITA ironically offers it as a mitigation to the issue of queuing at the ARL's new roundabout by stating (p.11) that *"As the traffic volumes continue to grow … it is possible that some upstream network elements such as intersections and passing lane merge points may limit the amount of traffic that can travel on SH1 in an hour. This may limit the hourly arrival flows at the roundabout and would lead to reduced queuing generated at the roundabout".*

Clearly the ARL's 740+ extra daily vehicle movements will exacerbate 'upstream' congestion (ie: the limiting of 'hourly arrival flows'). To contribute substantially to existing congestion, and then put it forward as a mitigating factor for new ARL roundabout congestion, seems somewhat duplicitous.

Again the effects of the ARL traffic operations appear more than minor and underpin the need for a waste by rail transport alternative.

APPENDIX 3 : EMISSIONS, AIR QUALITY AND HUMAN HEALTH EFFECTS

The AEE (and ITA [Technical Report M]) Include no assessment of the environmental effects of the increased fuel burn by heavy vehicles delivering waste to the proposed ARL's more distant location (we estimate an additional 30-40 tonnes of Co2 emissions daily; see below)

Additionally there is no assessment of the resultant increase in road safety, accident and injury risk.

Note that these matters are also not assessed or addressed in AEE Sections 9:4 'Air Quality', 9.16 'Human Health Effects'.

3.1 Increased fuel burn and resultant Co2 emissions:

While electric mule trucks are proposed for on-site bin haulage, for the foreseeable future most ARL-generated road traffic (particularly heavy vehicles) will be diesel powered. There are significant un-assessed environmental considerations. For example:

- Based on a 120km round trip MERRA estimates a daily diesel fuel burn in excess of **14,000 litres (producing almost 38 tonnes of Co2 emissions)** from ARL heavy vehicle movements alone[19]. This figure ignores the 220 other ARL vehicle movements daily and 40 logging vehicle movements daily.
- Deducting the fuel burn/emissions for the Albany to the existing Redvale Landfill (7.8km) the proposed new location will still result in an extra 33 tonnes of diesel-burn Co2 emissions per day.
- Rail offers the prospect of 'back-loading' waste northbound[20]. This could enhance the already considerable fuel and Co2 emission savings offered by rail. By contrast trucks would make the c60k return trip empty.

3.2 Noise, vibration and loss of amenity resulting from increased (heavy) traffic flows:

While these effects are addressed in terms of landfill operations there is a failure to offer any parallel assessment with regard to ARL (heavy) traffic and its effect on other road users, residents adjacent to SH1 etc.

[19] Assuming a 60k average one way trip (Albany to Springhill as discussed previously) and average fuel burn of 45 litres per 100km for each heavy vehicle the maths is: 520 movements x 60k = 31,200k/100 x 45 litres = 14040 litres per day. One litre of diesel consumed = 2.68kg of Co2 therefore daily Co2 emission would be 14040 x 2.68 = c37,627 kg or 37.63 tonnes of Co2. This is 5.1 million litres of diesel and 13.6 million tonnes of C02 emissions per year.

[20] particularly if southbound freight volumes from Northland and Northport increase as predicted; see Appendix 4: Kiwirail and UNISCWG

APPENDIX 4: Key documents:

Kiwirail upgrade announcements and plans

See https://www.kiwirail.co.nz/what-we-do/projects/northland-rail-rejuvenation/

The Upper North Island Supply Chain Working Group (UNISGWG) Final Report

https://www.transport.govt.nz/assets/Import/Uploads/Research/Documents/Cabinet-Papers/1.-MOT10025-UNISCS-Final-Report_final_8-11-19.pdf

Thull, 2011 Research Paper and reference list**: 'Transport of solid waste - road transport versus rail transport- case study Christchurch'.**

https://researcharchive.lincoln.ac.nz/bitstream/handle/10182/4415/transport_solid_waste.pdf?sequence=1

APPENDIX 5: Critique of the Integrated Traffic Assessment (Technical Report M):

Our reference is Auckland Transport's 'Integrated Traffic Assessment: Guidelines' 2015

The following table highlights the shortcomings with specific reference to MERRA's points of submission included (in bold).

Excerpt from Auckland Transport's ITA Guideline 2015	**Commentary with reference to MERRA's submission**
3.1: *ITAs are more comprehensive than traditional Traffic Impact Assessment (TIA) which tended to consider only the traffic impacts of a proposal on the surrounding road network*	The assessment is mainly concerned with the safe and efficient operation of the proposed roundabout on SH1 and the local road access to the site. **There is no comprehensive assessment of the wider impact of the ARLs heavy traffic movements on the wider roading network. Additionally there is:** • **No in depth consideration of movement timings by day/month** • **No detailed consideration of how the phasing of vehicle movements might impact or mitigate SH1 congestion** • **No detailed look at potential effect on holiday/summer peaks** • **No consideration of accident/fatality rate** • **No analysis of fuel burn/emissions.**
3.1 *Transport and planning policy in the Auckland Region has moved towards a more holistic view of transport that considers access by a range of modes*	The assessment pays very little attention to the wider transport network, other than in setting the context for conditions at the roundabout. **As above… the assessment is silent on a waste by rail transport alternative (and other alternative modes).**

Continues over…

3.1 *These guidelines place a particular emphasis on using the policy and strategy context in Auckland as a tool within the ITA process to encourage applicants and their practitioners to consider the full range of transport modes when planning their development proposal*	The assessment does not reference the policy and strategy context in Auckland and the full range of transport modes has not been considered when planning this proposal. **There is no reference to critical documents, policies, goals or targets** (see p.4 above). **Consequently no alternative to conventional road transport (eg rail) is considered. Hence comparative analysis in the critical areas of emissions/environment, safety or congestion are missing.**
3.1 *an applicant and their advisors, through the preparation of an ITA would be expected to look first at measures to reduce travel demand, followed by measures to utilise existing transport networks more efficiently, encouragement of other modes, and finally adding more road capacity if no other alternatives exist*	The assessment appears to ignore AT/NZTA's "four stage intervention process that "is a key driver of the AT / NZTA Integrated Transport Programme 2012 to 2041. **The ITA does not identify or consider measures to reduce transport demand nor measures to utilise existing transport networks more efficiently. There is no evidence of encouragement to use other non-road modes (for example rail).**
3.2 *ITAs promote "due consideration to the principles of transport and land use integration, and proper thought to alternative modes"*	The assessment does not address these principles. **As above there is no proper thought given to alternative modes (such as rail).**
3.2 *The main objective of an ITA is to ensure that the transportation effects of a new development proposal are well considered, that there is an emphasis on efficiency, safety and accessibility to and from the development by all transport modes*	There is no evident consideration from efficiency or safety perspectives nor transport modes other than road. **There is no assessment of the safety, environmental or wider congestion risks associated with a 60% increase to heavy traffic volumes (eg MERRA's evidence is that rail is >66% more fuel efficient than road and 95% safer)**
3.2 *the adverse transport effects of the development have been effectively avoided, remedied or mitigated.*	The adverse traffic effects (outside the proposed ARL roundabout) have not been assessed in any depth. Consequently **the adverse transport effects of the proposal have not been effectively avoided, remedied or mitigated.**
3.2 (example provided) *Industry and freight based activities should be… accessible to rail corridors. This will ensure opportunities exist to move goods and freight by either rail or road… and will ensure that goods can be transported in an efficient and direct way.*	While the location is adjacent a rail line there is no serious assessment of the benefits of transporting waste by rail. **Contrary to the intent of the guidelines the ITA is 100% road transport focused (in direct contrast with this example).**
3.3: In scoping an ITA…Other key transport agencies that need to be consulted are the NZTA and KiwiRail	The ITA fails to progress the AEE's January 2019 position (see 12.7) and offers no evidence of further engagement with Kiwirail.

APPENDIX 6: Proximity of the proposed ARL site to the North Auckland Rail Line (NAL).

(Annotated Google maps screenshot)

Distance by road is 2.8km. The 'as the crow flies' distance is 2 kilometres.