

Submission on

# Resource Consent Application

Form 13

Under Section 96 of the Resource Consent Management Act 1991.



**Reference Number:**

RCS221038432

**Submitted On:**

20/10/2022 12:27 p.m.

## Person making submission:

**Surname**

Ward

**First Name(s)**

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## Submission on:

**Application No**

CP-2022-111365-00 / CD-2022-111366-00 / CC-2022-111367-00 / CR-2022-111368-00 / CO-2022-111369-00 / NC-2022-111370-00 / LU-2022-111371-00

**Name of Applicant**

Gillian Ward

**Type of resource consent applied for**

Eastland Port: extension of wharf 8, reclamation of the coastal marine area, rebuilding the outer breakwater, upgrading stormwater treatment in southern log yard, and capital and maintenance dredging & dumping

**Brief description of proposed activity**

Stage 2 Twin Berth Proposal

**Position on application**

I oppose the application

**Clearly state which parts of the application you support or oppose or wish to have amended:**

Any upgrade or redevelopment of existing Port assets, or addition to Port assets, should first consider the wider context of the connection of the Port to the local and regional transport infrastructure, and the impact of the resultant increase in freight movements on the community.

In the resource consent application, the "location" is noted as being Eastland Port including existing wharf side areas, the Port basin, and the coastal marine area. Eastland Port does not exist in isolation though, and the impact on the wider community of delivery of freight into the port must be considered as part of this application.

Eastland Port is dependent on the road infrastructure for freight delivery. Truck movements already impact the Gisborne community. The Port was connected by rail in the recent past and should be again connected by rail before any proposals which would cause an increase in heavy truck movements should be consented.

**The reason for making my submissions are (briefly describe the reasons for your views):**

1. The applications for Stage 2 of the Twin berth Proposal are stimulated by the Port's perceived need to handle the currently large, and increasing, log production of the region, as well as a desire to be able to offer a limited container handling service.

The Gisborne Rail Action Group does not consider it necessary for Eastland Port to increase the capacity of log tonnage that is

being managed currently or install container handling capacity. Instead, the rail line to Napier (and beyond) needs to be reinstated. The Palmerston North to Gisborne railway line would predominantly carry containers and in addition, could offer an economic option to forestry companies for logs to be carried south in the event of Eastland Port temporarily reaching full capacity, or being impacted by adverse weather. The Port and reinstated railway line south of Gisborne should operate simultaneously, in a complementary manner.

The May 2022 GDC and Hawkes Bay Regional Council commissioned Gisborne Rail Reinstatement Update Assessment Report provided updated freight, engineering, and cost assessments for the railway line reinstatement. The report includes the development of an intermodal freight yard at Matawhero, which would provide a base for shuttle services for freight to Eastland Port as well as for assembling trains to Napier. The Tairāwhiti Regional Land Transport Plan 2021-2031 notes that, “While reinstatement of the Gisborne to Wairoa rail line was not included in the New Zealand Rail Plan 2021-24, we will continue to advocate for the project’s inclusion in later years.”

Gisborne District Council supports the reinstatement of the railway line south. The Regional Land Transport Plan – 30-year vision includes that, “Economic development in the region is not limited by the roading infrastructure. Exports and imports are supported through appropriately maintained intra- and inter-regional connections which offer a choice of mode including low-carbon alternatives (e.g. rail and coastal shipping).”

2. Schedule 4 in the RMA notes the information required in an assessment of environmental effects and that any effect on the wider community, including any social, economic, or cultural effects, should be addressed.

Resource Management Act 1991 No 69 (as at 28 September 2022), Public Act Schedule 4 Information required in application for resource consent – New Zealand Legislation

RMA Schedule 4, Assessment of environmental effects  
6 Information required in assessment of environmental effects  
(1)An assessment of the activity's effects on the environment must include the following information:  
(a)if it is likely that the activity will result in any significant adverse effect on the environment, a description of any possible alternative locations or methods for undertaking the activity:

The RMA requires that an applicant considers alternative locations or methods for undertaking the activity to mitigate adverse effects. However, neither Appendix D (Alternatives Assessment Report) nor Appendix AEE (Assessment of Environmental Effects), consider the option of using rail to deliver some of the freight to the Port.

Appendix O (Traffic and Engineering Report, by East Cape Consulting), regarding the rail network notes, “At this point in time, the Port cannot receive freight by rail as there is not enough space for a modern rail head at the Port and no current proposal by KiwiRail to connect the Port to the existing rail

network.”

The Gisborne Rail Action Group notes that the rail proposal offered to Eastland Port in 2018 by a rail operator did not include establishing a rail head at the Port. The proposal was to shunt small numbers of loaded log wagons into the Port and remove unloaded wagons on a continuous shuttle. The rail head could be initially the Gisborne Railway Station, but ideally it would be at the proposed intermodal freight yard facility at Matawhero, at the site of the Matawhero rail yard.

Other Aotearoa New Zealand ports use rail as well as trucks for freight delivery into the port. It is common for there to also be playgrounds, walkways, and cafes in these situations since the coastal areas surrounding ports are attractive places for people to visit. To alleviate safety concerns in the Gisborne Inner Harbour area, a rail shuttle would move slowly within the rail corridor through the Inner Harbour. The rail corridor is owned by Eastland Port from the Harbourview Apartments all the way into the log yard. Reinstating this freight connection would allow some freight movement to be achieved with lower carbon emissions than is possible with trucks and would offer resilience to Eastland Port who are currently totally dependent on the road infrastructure.

Considering RMA schedule 4, paragraph 6, the alternative of using rail for some of the freight delivery into the Port to reduce the environmental impacts has not been thoroughly considered.

3. Eastland Port’s Twin Berth Proposal includes an expectation that more trucks will provide the increased freight (mainly log) delivery to the Port and that the Gisborne community will accommodate the impact of this. The impact on the quality of residents’ lives; the attractiveness of our small city; the safety of other road users; the CBD congestion, noise, and hazardous dust; the CO2 emissions impact; and the cost of road maintenance, is in effect transferring this transport cost from the Port to the community. Diesel exhaust emissions, and brake, tyre, and road particulate matter, are likely to be impacting the health of residents who live close to truck routes. Although the Gisborne community appreciates the Port operation, this should not come with these extra unwanted impacts.

RMA Schedule 4, Assessment of environmental effects

6 Information required in assessment of environmental effects

(1) An assessment of the activity's effects on the environment must include the following information:

(f) identification of the persons affected by the activity, any consultation undertaken, and any response to the views of any person consulted:

7 Matters that must be addressed by assessment of environmental effects

(1) An assessment of the activity’s effects on the environment must address the following matters:

(a) any effect on those in the neighbourhood and, where relevant, the wider community, including any social, economic, or cultural effects:

Referring to paragraph 6, residents and businesses who live and work close to the routes used by HCVs have not been identified

or consulted, and referring to paragraph 7, there has been no consideration of the impact of the Twin Berth Proposal on the wider community. In fact, these residents, businesses, and the wider community have been excluded from consideration because the location of the area of impact is determined to be the “Eastland Port including existing wharf side areas, the Port basin and the coastal marine area” only.

The report in Appendix O (Traffic and Engineering Report), notes, “The Proposal is expected to increase the port’s average daily throughput and enable Eastland Port to meet forecast log export demand from the Tairāwhiti. It is not expected to significantly increase its peak daily throughput (1,250 heavy commercial vehicles (HCV)/day generated by the Port) or its peak hour throughput (105 HCV/hour generated by the Port) because of other constraints including space, safety, and the availability of other resources as detailed in this report.”

In the operational traffic effects summary (Page 201, Appendix AEE), “On this basis, and subject to implementation of an OTMP to detail and manage operational traffic and parking matters, the operational traffic effects of the Proposal are considered to be no more than minor.”

The Gisborne Rail Action Group considers that there has been minimal acknowledgment of the impact of “traffic effects” on the Gisborne community in this application. The total number of HCVs generated by the Port, and the daily and hourly peak numbers, are both unacceptable currently, and an increase will have impacts that are more than “minor”. The Rail Group opposes any activity that would lead to an increase in the total number of HCVs generated by the Port. Reinstating the rail connection to the Port would provide an alternative mode for freight delivery to the Port and would reduce the number of HCVs travelling through Gisborne.

**I wish the Gisborne District Council to make the following decision (give details, including nature of any conditions sought):**

It should be acknowledged that these resource consent applications affect not only the immediate Port environment but also the wider community. The applications should only be approved by the Council if the rail connection into the Port is restored and upgraded as part of the resource consent applications for the Twin Berth Proposal. This rail connection needs considerable investment, which should be provided by the Port, because moving freight to the Port is an integral part of the Port operation. This request is made on behalf of the Gisborne community because reinstating this rail connection would in part mitigate the social and environmental impacts of moving freight by road through residential areas and the CBD to Eastland Port. The rail connection should be restored by Eastland Port in acknowledgement that the Port is connected to and is a part of the Gisborne community, and to demonstrate that the Port desires to operate in a manner which reduces the adverse community impact of its operation.

**I wish to speak at the hearing in support of my submission**  
**Would you consider presenting a joint case with others who have made a similar submission?**

Yes  
Yes

## Confirmation

**Are you submitting this form on behalf of another person?**

Yes

<b>Name</b>	Gisborne Rail Action Group
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<b>I confirm that all the above details are correct.</b>	Yes