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Eastern Busway

3 March 2023

Auckland Council
Private Bag 92300
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Attention: Warwick Pascoe - Principal Project Lead, Auckland Council

Dear Warwick

Re. Response to Council further information requests for the EB2 and EB3R Application Packages

I am writing in regard to Auckland Council's (the Council) further information request letter of 9 September 2022 for the Eastern Busway 2 (EB2) and Eastern Busway 3 Residential (EB3R) application packages, as well as further correspondence received in regard to Industrial Trade Activities.

Firstly, we wish to address Auckland Council's email of 22 February 2023[1] and its interpretation that the works being undertaken by EBA fall within the ambit of E33 as an Industrial Trade Activity. In particular, the e-mail stated:

"I am still in the opinion that assessment under E33 of the AUP O-P for the whole developed site is required (categorising the activities as unlisted activity)."

Respectfully we set below the reasons that we do not believe any general authorization for the construction yards associated with the busway is needed under Chapter E33 of the Auckland Unitary Plan (Operative in Part) (AUP(OP)). The temporary construction yards will serve as laydown areas of preconstructed structural elements, equipment (as noted previously such as gantry crane prior to erection), a satellite site office and staff facilities (including portable toilets). Some storage of inert materials, such as gravel, will be undertaken at these sites, but primarily at the established construction yard at Pakuranga Road.

The construction yard that was consented under LUC60403744 is operational. Any concerns with respect to compliance will be raised with the Auckland Council compliance monitoring officer, Ada Wang, during the regular site investigations. However, we can confirm that the only activity on site where potential discharges may require consent, are bunded and a sucker truck removes any potentially contaminated water (including from the wheel wash). No contaminants generated by

[1] The e-mail was sent directly by Arsini Hanna (Senior Specialist Advisor - Stormwater and Industrial and Trade Activities)

activities that would qualify under Chapter E33 of the AUP(OP) are discharged to the stormwater network.

In regard to the Bentonite/Polymer plant, we can advise that EBA is currently securing the supplier for this activity. The contract with that supplier will require a hazard assessment, and a clear methodology for ensuring that potential contaminants cannot and will not be discharged to the stormwater network.

We note the Ms. Hanna is relying on the "unlisted category" as a consent trigger. Our reading of the AUP(OP) provisions provides for unlisted activities (i.e. those not listed in Table E33.4.3 as permitted by Rule E33.4.1 (A3)). Additionally, we note that discharges of contaminants from unlisted activities are permitted by Rule E33.4.1 (A11). EBA have reviewed the relevant permitted activity standards of this Chapter E33 and considers that these standards will be complied with (i.e., a resource consent will not be required).

Please note that we have made this assessment with the inputs from the Project's own environmental and construction specialists. We will not be seeking any land use consents under section 9(2) in relation Chapter E33 of the AUP(OP) given the permitted activity status of the Project's construction under that chapter.

Furthermore, we draw attention to the Construction Environmental Management Plan (CEMP), which was supplied with the applications for both EB2 and EB3R. This draft management plan covers the broad range of construction activities for the Project, including spill plans and refueling of construction equipment. The proposed condition set for both application packages provides a mechanism for recertification of the CEMP in the event that further detail is needed to address the operation of the bentonite/polymer plant. We also note Auckland Council is the decision maker as to whether an altered management plan can be recertified, which provides surety to stakeholders that all appropriate AUP(OP) standards and controls will be employed during construction.

Lastly, EBA has reviewed the Council's letter and has addressed the transport related queries raised by Council's specialists, set out below. Following further analysis of both applications' transport effects and refinement of their operational designs, the Integrated Traffic Assessment (ITA) has been updated (**Attachment 1 to this letter**) to reflect the Eastern Busway Project's traffic related effects. This has included updates to the following key sections of the ITA:

- Updated crash environment assessment – Section 3.8.1
- Updated proposed design and construction methodology – Section 4.2
- Updated temporary effects to general traffic – Section 5.2
- Updated temporary effects to bus travel times – Section 5.3.5
- Updated permanent effects to general traffic – Section 6.3
- Updated permanent effects to bus travel times – Section 6.4.7.

During the development of the updated construction methodology, based on an updated design, efforts have been made to shorten the overall construction programme where feasible as well as fine tuning construction staging so as to minimise adverse effects to road traffic.

Regardless of the above-mentioned updates, the quantum of any adverse environmental effects on parking, access and other transport matters has not increased above those detailed in the submitted ITA. Given this, AT considers that the updated ITA does not affect the Project's resource management process to-date and can be addressed through the Council's own section 42A hearing report and associated technical reporting.

Similarly, the mitigation for these effects is addressed through AT's proposed conditions and updated design. We are not proposing any changes to the draft conditions provided at lodgment of EB2 and EB3R consent packages. This mitigation is primarily achieved through the use of a Construction Traffic Management Plan (CTMP). CTMP's are commonly employed on major infrastructure projects within Tāmaki Makaurau and constructors are familiar with their implementation.

On this basis, AT has provided the updated ITA for Council's consideration, as well as transport specific responses listed below[2].

56. *It is noted that the ITA does not appear to include vehicle tracking plans as part of its appendices. This information is required to provide confirmation of the proposed design layout meets the vehicle manoeuvring requirement and aligns with the Transport Design Manual standards. Please provide the vehicle tracking curve analysis for all intersections to demonstrate the feasibility and practicality of the proposed intersection layouts, with greater focus being placed on those with multiple turning lanes and overlapped movements according to the intended phasing operations.*

    A copy of these tracking curves is provided as **Attachment 2** and show that the Project's intersection designs are compliant with the Transport Design Manual standards. Furthermore, it is noted that the Project's design has been subject to Road Safety Audits (RSAs).

57. *Section 3.8.1 of the ITA states that the crash data only covers the period from 2015 to 2019. Although it is acknowledged that the rationale may consider this data most relevant due to Covid effects from 2020 onwards, it is still important to identify any new crash trends derived from possible changes in new traffic patterns. Please provide an updated crash record to include all available data in 2022 to ensure all the latest safety risks can be identified.*

    An updated assessment of the Crash Environment is provided in Section 3.8.1 of the ITA which includes crash data for the five-year period from 2017 to 2022.

[2] The numbering for these responses matches those from Council's own section 92 letter. This numbering has been retained to assist the reader.

58. *It is noted that the ITA includes relevant appendices to demonstrate phasing diagrams at different project stages. However, the 3-staged mid-block pedestrian crossing across Ti Rakau Drive between Marriott Road and Edgewater Drive has not been elaborated on. Please confirm how the intersections and associated phasing are expected to be operated, i.e., three standalone signalised crossings or staggered pairs?*

A mid-block signalised pedestrian crossing will be provided across Ti Rakau Drive between Marriott Road and Edgewater Drive west, in proximity to the Edgewater bus station. The crossing will be a three-stage staggered signalised crossing, which will run across the two Ti Rakau Drive eastbound general traffic lanes, the two central dedicated bus lanes and the two Ti Rakau Drive westbound general traffic lanes.

Due to the limitations of the SIDRA traffic modelling software, which can only model at maximum a two-stage signalised crossing, the three-stage crossing was modelled as two separate intersections alongside each other.

The SIDRA model of the signalised crossing is shown in Figure 1, for the geometric layout of the signalised crossing refer to Appendix C in the ITA.

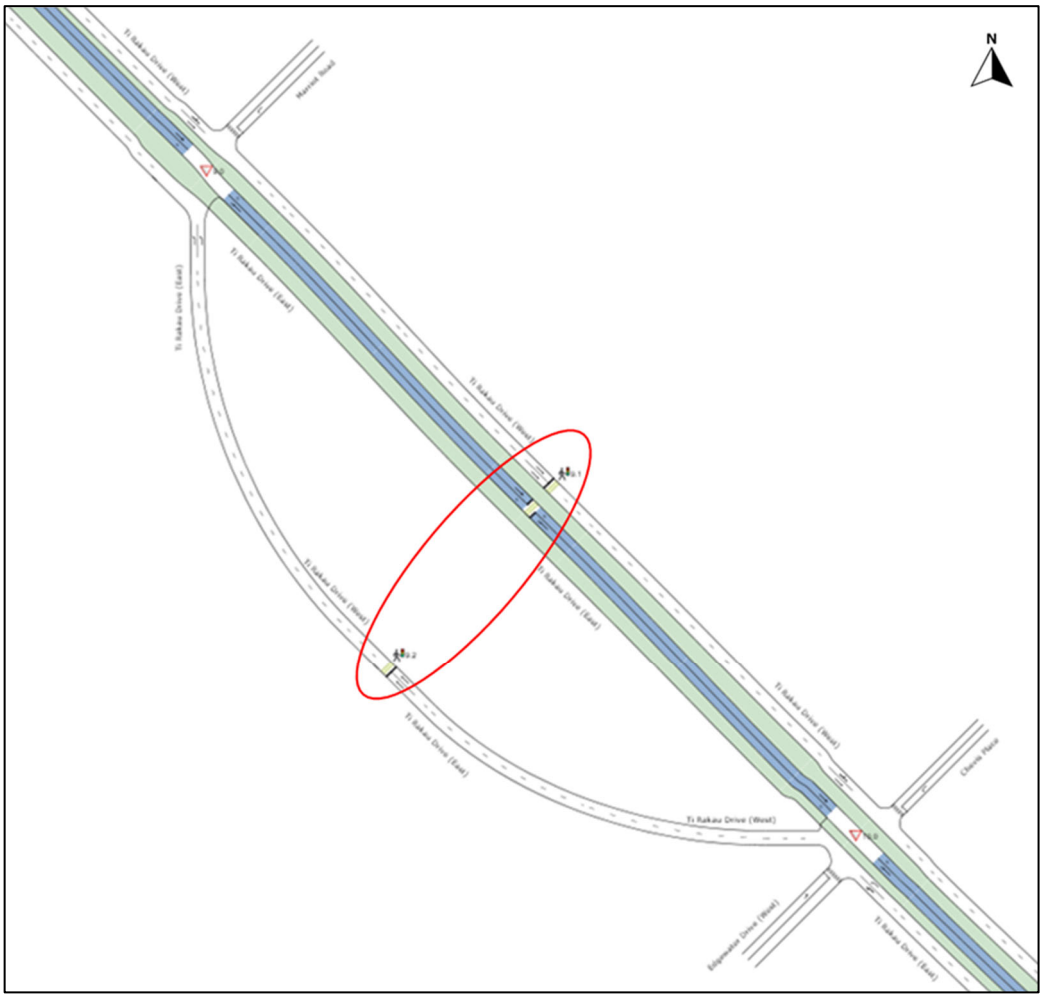

Figure 1: SIDRA model layout - Edgewater bus station midblock pedestrian crossing

59. *Section 5.3.2 describes the temporary rerouting of Bus 711, which will result in bus patronage to use Bus Stop 6127 on the western side of Ti Rakau Drive from the current Bus Stop 6060 inside the mall. Although there may not be a significant difference in travel distance, it will be problematic (if not dangerous) for pedestrians crossing Ti Rakau Drive without crossing facilities in the vicinity of Aylesbury Street/Ti Rakau Drive intersection. Please provide further consideration and assessment of temporary crossing facilities to assist pedestrians in continuing to use bus services in a safe and efficient manner.*

    Temporary bus rerouting, as well as the pedestrian connections to these buses, will be managed through the CTMP as required by the proposed conditions sets. The draft CTMP also details the bus service rerouted and notes that existing bus stops will be used for the 711 service. Please refer to the CTMP for further detail.

    The proposed Ti Rakau Drive / Aylesbury Street / Palm Avenue intersection will now be completed much earlier in the construction programme and will provide additional pedestrian crossing facilities across Ti Rakau Drive, refer to Section 4.2.1.5 of the ITA. The temporary Ti Rakau Drive bus stop for westbound 711 services is well-serviced by existing signalized pedestrian crossings at the Ti Rakau Drive/Pakuranga Road and Ti Rakau Drive/SEART/Reeves Road intersections. These existing crossings and the change to the construction staging are considered adequate to address pedestrian movements across Ti Rakau Drive during EB2's construction.

60. *It is evident that bus travel time through all parts of the overall project is expected to experience substantial increases during Construction Stage (CS) 1. Figure 1 (below) shows approximately 40% delay on Bus 70, which is one of the busiest routes in Auckland and likely to have a significantly negative impact on bus patronage and travel experience during this CS1 period (with potential effects longer term). Please provide identification, consideration and assessment of potential mitigation measures to reduce bus travel times during CS 1.*

    During the development of the updated construction methodology, based on an updated design, efforts have been made to shorten the overall construction programme where feasible as well as to produce construction staging with fewer adverse effects on road traffic (see Section 4.2 of the ITA).

    This process has also led to a more refined construction staging. The temporary effects were modelled in five separate construction stages (previously three stages) to simulate the expected traffic distribution that could occur due to changes in the road network (see Section 5.2.2, 5.2.3 and 5.3.5 of the ITA). These stages will be managed through the CTMP and SSTMPs.

61. *Similarly, it is noted that there will be an increase in bus travel time upon project completion as shown in Figure 2. It is expected that a flagship public transport improvement project such as the Eastern Busway will provide better travel or at least not worse travel times than currently. Please clarify the main reasons for longer travel times for various bus routes as demonstrated within the following tables, some of which are at least 10% longer than the travel time in the Do Minimum Scenario.*

An updated design is proposed, with an updated description for both EB2 and EB3R being provided in Section 4.2 of the ITA. Consequently, an updated assessment of the new proposed design and expected permanent effects to bus travel times has also been undertaken, as detailed in Section 6.4.7 of the ITA.

The new 72 route is predicted to have marginally longer travel times, in both directions during both the AM and PM peaks, compared to the 72C and 72M services it is replacing. This is due to a longer route distance (approximately +2.17km), and an expected increase in traffic volumes on Pakuranga Road to the east of the Flyover. However, the new 72 service will be running at higher frequencies in both directions.

Travels times for the 72X, 711 and 712 services are predicted to increase in the outbound (eastbound) direction during the PM peak. This is likely due to the route changes of these services, particularly the additional number of intersections these services have to pass through as well as the expected increase in traffic volumes on Pakuranga Road, east of the Flyover. Again, while service frequencies for the 72X are expected to remain the same, service headways for the 711 and 712 services will be significantly improved.

Furthermore, the integration off all services at the Pakuranga Town Centre station will provide for an improved transfer experience between services. Passengers will not be required to walk across the Pakuranga Plaza to transfer between services on Pakuranga Road and Ti Rakau Drive.

In line with the Project objectives, significant public transport capacity and travel time improvements are expected for bus services travelling on Ti Rakau Drive between Botany and Panmure, particularly in the peak directions of travel (westbound in the AM peak and eastbound in the PM peak). The expected travel time results do however indicate the potential need for future investment in public transport infrastructure on Pakuranga Road between the Pakuranga Town Centre and Howick.

62. *Section 5.3.6 of the ITA discusses the continuation and potential changes in school bus services during various construction stages. Please describe and confirm that safe crossing points will be provided for school students where required.*

    AT will provide safe crossing points from temporary school bus stops and this will be governed through the CTMP. AT and EBA will continue to work with the affected schools to communicate school bus stop changes and the importance of students correctly using temporary pedestrian routes/crossings.

63. *It is not clear in the ITA if or where any bus priority techniques will be implemented along the corridor apart from dedicated bus lanes and associated phasing. The modelling results seem to favour reduction of private vehicle delays but no improvement of bus travel times. Please advise if bus priority operations will be included such as bus pre-emption or other techniques.*

    In order to provide buses with a level of service (LOS) of C or better, as per the Project Minimum Requirements, the following measures were included in the traffic signal design:

    - Some form of priority is provided for buses, to balance the delays to vehicles and pedestrians
    - Extending the current bus phase to enable an approaching bus to pass through the intersection
    - Allowing the bus phase to interrupt once per cycle when a bus is on approach to the intersection
    - Bus priority added in the form of approach and departure loops following review of traffic modelling
    - Managing bus priority through SCATS using advance calls and departure loop inputs at each site
    - Queue detection loops are provided on an as-needed basis only and in collaboration with AT.

    The above measures have been designed to adjust bus priority to suit traffic conditions and flow patterns, and to avoid blockage to busway movements and operate intersections efficiently. The bus priority operations at each of the specific intersections are detailed in EB-2-D-2-IT-RP-100001 (EB2 area) and EB-2-D-3-IT-RP-100001 (EB3R area). In terms of traffic modelling undertaken to simulate these above measures, see Section 2.4.4.3 of the ITA.

64. *The project may achieve a better overall outcome to allow integrated transport options. Please confirm your consideration and assessment of bicycle parking provisions at each bus station to provide convenient (and safe) transfer between travel modes.*

Bicycle parking is provided at Pakuranga Station, Edgewater Station and Gossamer Station. The type and amount of bicycle parking is dictated, in part, by the function and location of each station.

The functional requirements, as per the Project Minimum Requirements, for the major interchange station at the Pakuranga Town Centre, is at least 20 cycle parking spaces and at least five cycle parking spaces at each of the intermediate bus stations at Edgewater Drive and Gossamer Drive, respectively.

Pakuranga Station, as a key destination for busway users and cyclists, has also been provided with a bicycle storage shelter. This shelter is located in close proximity to the bus station's platforms and will provide bicycle storage for both bus users and visitors to Pakuranga Town Centre itself.

In comparison, both Gossamer Station and Edgewater Station are intermediate stations, and it is not anticipated that either of these stations will experience the same volume of patrons as Pakuranga Station. Both of these intermediate stations are space limited (when compared to Pakuranga Station) and it is not possible to provide a storage shelter or the same volume of bicycle parking. However, the Project will provide bicycle stands for busway users who wish to leave their bicycles at either station.

65. *Ti Rakau Drive/Pakuranga Road Intersection - The tightness of the turn through the south-eastern quadrant of this intersection is likely to accommodate waiting pedestrians at the crossings and create potential conflict with the adjoining two-way bicycle path. Please confirm consideration of this issue and provide possible design solutions to address this identified safety risk.*

This intersection has been subject to redesign as noted in Appendix B of the ITA**.**

It is also noted that the design has been subject to a Road Safety Audit (RSA), which has confirmed that the amended design meets AT's roading standards and provides a safe roading environment. In addition, these works will be subject to an Engineering Plan Approval (EPA) from AT which provides a further opportunity to refine the safety aspects of the design.

66. *There is a lack of cycling provision to connect with the Pakuranga Plaza area (also referred to as Pakuranga Town Centre), which is the main destination of the cycleway. Please confirm your design consideration of this matter and assessment of the cycling provision and connection on the eastern side of the intersection.*

    As per detailed in Section 4.2.1.5 of the ITA, a bidirectional cycleway will be provided on the northern side of Ti Rakau Drive, fronting the Pakuranga Town Centre, between Pakuranga Road and Reeves Road as part of the EB2 works. This bidirectional cycleway will connect to the cycleways along Pakuranga Road to the west, as part of EB1 and EB2 works and will connect to the unidirectional cycleways along Ti Rakau Drive further east, as part of the EB3R works.

    It is considered that these cycleways are a significant improvement on current active transport connectivity between the town centre and surrounding area.

67. *Cortina Place/Aylesbury Street Intersection: It is understood that the intersection footprint will need to accommodate large trucks. As a consequence, these large radii within the intersection will likely result in higher speeds being adopted by smaller vehicles and potentially create a hazardous environment for active road users (e.g., pedestrians). Please consider the combination of traffic calming and traversable aprons, as well as safe provisions for pedestrians and cyclists to obtain access to the Pakuranga Plaza area.*

    Please note that this intersection will be located in a low-speed environment with a posted 20 km/h speed limit that has been proposed to protect active road users. In addition, with the construction of the Reeves Road Flyover and alterations of Reeves Road, the use of Aylesbury Street as a 'rat run' for vehicle traffic is expected to decrease, further reducing the potential for conflicts between motor vehicles and active road users.

    Furthermore, this intersection has been subject to an RSA, which has confirmed that the amended design meets AT's roading standards and provides a safe roading environment for all users. In addition, these works will be subject to an Engineering Plan Approval from AT which provides a further opportunity to refine the safety aspects of the design if needed.

68. *Cortina Place/Reeves Road Intersection: The raised features at this intersection are likely driven by the stormwater design consideration but they will result in problematic access experienced by mobility users and cyclists due to creating low points at both kerb edges. Please explore and consider design alternatives to provide better provisions for active user groups.*

    This intersection has been subject to an RSA, which has confirmed that the amended design meets AT's roading standards and provides a safe roading environment. In addition, these works will be subject to an EPA from AT which provides a further opportunity to refine the safety aspects of the design if needed.

69. *Ti Rakau Drive/Ti Rakau Drive Off-Ramp Intersection: Please confirm your design consideration to integrate the existing shared path with Seven Oaks Drive with the cycle path features of the project.*

    AT can confirm that this cycle path connection is provided for beside the SEART off-ramp and is shown on the submitted landscape plans.

70. *Pakuranga Road/Reeves Road Intersection: It is identified that the road user provision at the immediate proximity of the intersection appears to be diminished including an unprotected cycle lane at the Pakuranga Road approach and unclear routes to connect southbound cyclists to the Pakuranga Road exit. Please consider optimising the cycling provision for all directions through this location.*

    It is noted that there is no Pakuranga Road/Reeves Road intersection. However, it is assumed that this query relates to the proposed Pakuranga Road/William Roberts Road/Reeves Road Flyover intersection. With regard to that intersection, it is noted that the proposed design is an improvement over the current cycling infrastructure given the proposed signalization of this intersection (the current Pakuranga Road/William Roberts Road intersection only features a give way sign), as well as tie ins to improved footpaths on Pakuranga Road and William Roberts Road.

    Furthermore, as with other proposed intersections, this intersection has been subject to an RSA, which has confirmed that the amended design meets AT's roading standards and provides a safe roading environment. Lastly, these works will be subject to an EPA from AT which provides a further opportunity to refine the safety aspects of the design if needed.

71. *Reeves Road/Aylesbury Street Intersection: The eastern crossing path at this intersection is constrained in its accommodation of safe crossing movements for either/both pedestrians and cyclists. Please confirm if sufficient space is available to allow for the proposed infrastructure while ensuring safe movements for active road users.*

    It is noted that the Project will signalize this intersection, whereas currently traffic movements are only controlled by give way markings/signage. In addition, the function of Aylesbury Street as a 'rat run' will decrease given the introduction of the Reeves Road Flyover and the altered function of Reeves Road itself (i.e. for local traffic and buses only).

    Furthermore, as with other proposed intersections, this intersection has been subject to a RSA, which has confirmed that the amended design meets AT's roading standards and provides a safe roading environment. Lastly, these works will be subject to an EPA from AT which provides a further opportunity to refine the safety aspects of the design if needed.

72. *Reeves Road/SEART On Ramp: It is recommended that the Applicant consider reducing the substantial median island to allocate more space to cycle lane protectors and separations between pedestrian and cyclist paths on both sides of Ti Rakau Drive, to achieve the desired safety and provision of cyclists through this area.*

    An updated design is proposed, refer to Appendix B in the ITA. The median island widths have been reduced, allowing for a greater separation between the cycleway and the general traffic lanes.

73. *Marriott Road/Edgewater Drive (West) /Chevs Avenue/Ti Rakau Drive intersections: It is noted that the proposal includes a raised platform at the Edgewater Drive approach to Ti Rakau Drive, but they are not present at the Marriot Road and Chevs Avenue approaches. Please elaborate on the reasoning for this and consideration as to why this preferred traffic calming feature is not implemented at all side road approaches as a means of providing safety and convenience for active mode users in a consistent manner across the project area.*

    As with other proposed intersections, this intersection has been subject to an RSA, which has confirmed that the amended design meets AT's roading standards and provides a safe roading environment. Furthermore, these works will be subject to an EPA from AT, which provides a further opportunity to refine the safety aspects of the design if needed.

74. *Pedestrian Jaywalking: In addition, the mid-block signalised pedestrian crossings are located centrally to bus stops on both directions. The inconvenient location will result in pedestrian jaywalking across the bus corridor, which can lead to potential safety risks and ineffective utilisation of the signalised crossings. Please discuss its design philosophy in relation to this matter and give consideration of other potential locations/alignments for these crossings.*

    As with other proposed intersections, this intersection has been subject to an RSA, which has confirmed that the amended design meets AT's roading standards and provides a safe roading environment. Furthermore, these works will be subject to an EPA from AT, which provides a further opportunity to refine the safety aspects of the design if needed.

    Furthermore, fencing is proposed in the median along the busway in EB3R, between Roseburn Place and Edgewater Drive east, to encourage pedestrians to cross Ti Rakau Drive at the provided crossing points.

75. *Wheatley Avenue/Edgewater Drive (East)/Ti Rakau Drive intersections: It is recommended that consideration be given to reallocating the road space to provide enhanced safety by way of protectors for cyclists from the carriageway by reducing the width of median islands.*

    As with other proposed intersections, this intersection has been subject to an RSA, which has confirmed that the amended design meets AT's roading standards and provides a safe roading environment. Furthermore, these works will be subject to an EPA from AT, which provides a further opportunity to refine the safety aspects of the design if needed.

76. *Gossamer Drive/Ti Rakau Drive Intersection: The links to the central median two-way cycleway in both directions on either side of Ti Rakau Drive is provided with insufficient crossing and median widths to safely and conveniently accommodate both pedestrian and cyclist user groups. In addition, the lack of cycling provision from Gossamer Drive northwards seems to miss a large catchment of possible users. Please optimise the cycling provision and connection in the vicinity of the intersection.*

    As with other proposed intersections, this intersection has been subject to an RSA, which has confirmed that the amended design meets AT's roading standards and provides a safe roading environment. Furthermore, these works will be subject to an EPA from AT, which provides a further opportunity to refine the safety aspects of the design if needed.

    Regarding cycling provision from Gossamer Drive northwards, further works northwards along Gossamer Drive would be located outside the Project's identified footprint and are out of scope for the consenting matters associated with EB3R's resource consent application.

77. *Ti Rakau Bridge: It is understood that the current extent of works will end at the western side of the Ti Rakau Bridge. Please confirm how the bi-directional cycleway will be terminated safely to ensure a smooth transition to future works, especially during interim phases of the project between the completion of EB3R and EB3C/EB4.*

    For the purpose of this assessment, it is proposed that the cycleway terminate on the western side of the Ti Rakau Drive / Gossamer Drive intersection, as shown in Section 4.2.2.3 of the ITA. Cyclists would continue to use the road carriageway to the east of the intersection as per the current arrangement.

    However, as will be shown in a future assessment which will include the proposed design for EB2, EB3R, EB3C and EB4, the proposed cycleway will continue along an offline alignment across a new bridge that will support both the new bus lanes and the cycleway towards the Burswood area.

78. *U-turn movements: It is noted that U-turn movements and associated phasing arrangements are provided at the intersections west of Marriot Road and east of Chevis Place, respectively. Please confirm if U-turn movements at other intersections will be prohibited along the corridor to rationalise safe and efficient movements.*

    U-turns are provided for by the EB3R design along Ti Rakau Drive at each signalized intersection. This will be provided by lane markings, signage and signal phasing under the AUP(OP)'s permitted activity provisions for road network activities.

79. *Construction Traffic Management Plan (CTMP): The CTMP highlights the important arrangement of temporary footpaths for pedestrians during construction works but it is not clear if a similar facility for cyclists will be provided either on-road or off-road. Please confirm if and how temporary cycling provisions will be provided for during the construction.*

    No temporary cycle routes have been identified at present. Instead, cyclists will continue to use existing road lanes, footpaths and shared paths to move through the Project area. In addition, cyclists will be directed to dismount and travel along temporary footpaths where required (e.g. works at the SEART/Reeves Road/Ti Rakau Drive intersection).

80. *Road Safety Audit (RSA) Response and Decisions: It is understood that previous RSAs have been undertaken and it will be useful for these to be included in the supporting documents to assist with understanding the design rationale and decisions made on relevant matters. Therefore, please provide the complete RSA document set with associated responses and agreed decisions on identified issues.*

    The RSAs are an internal AT reporting mechanism to confirm engineering design detail, rather than an assessment of an environmental effect per se and will not be provided at this time.

Based on the above, EBA considers that the Council's transport related queries have been sufficiently addressed. This includes the provision of an updated ITA, direct responses to Council's earlier transport queries and confirmation that the proposed condition set (namely the use of a CTMP) addresses the potential transport effects of both application packages. Lastly, we consider that any issues regarding Industrial Trade Activities have been suitably addressed.

As such, EBA considers that these matters have been resolved.
Yours sincerely

Matt Zame
Alliance Project Director

Attachment 1 – Updated ITA and associated Appendices

Attachment 2 – Tracking Curves