



## Report pursuant to s42A Resource Management Act 1991

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| <b>In the matter of:</b>    | A Notice of Requirement to construct and operate a new intermodal rail and freight hub on land between Palmerston North and Bunnythorpe |
| <b>And:</b>                 | A hearing by Palmerston North City Council pursuant to s100A  |
| <b>Requiring Authority:</b> | KiwiRail Holdings Ltd   |
| <b>Hearing date:</b>        | 9 August 2021   |

S42A Report: Palmerston North City Council Infrastructure Assets

By: Robert van Bentum – Chief Engineer

# 1 Executive Summary

1. This evidence will address the impact of the KiwiRail Freight Hub ("the Freight Hub") on the Palmerston North City Council's ("PNCC") existing and future three waters and roading infrastructure. It will specifically focus on the following topics:
  - a. The Project Agreement ("PA") between PNCC and KiwiRail;
  - b. The Palmerston North Integrated Transport Improvements project (PNITI) and how the Freight Hub will potentially impact on the future delivery of this strategic set of projects;
  - c. The impacts on PNCC's 3- waters and roading infrastructure;
  - d. The impacts on PNCC's proposed Palmerston North to Feilding shared pathway.
  
2. At the time of writing this evidence the key issues for PNCC infrastructure are as follows:
  - a. Protecting the ongoing operation and potential future upgrade and expansion of PNCC's groundwater abstraction, treatment and storage facility, being infrastructure of regional significance under the One Plan, located at the intersection of Railway Road and Roberts Line;
  - b. Ensuring that the current operation and future upgrades of existing and planned 3-waters services and connections between Palmerston North and Bunnythorpe are secured and provided for;
  - c. Ensuring that the planned construction of a shared walking and cycling pathway between Palmerston North and Feilding through Bunnythorpe along the eastern side of the railway line is facilitated and any impacts from the Freight Hub are effectively mitigated;
  - d. Ensuring that the proposed upgrade of Richardson's line, which is programmed to be undertaken later this calendar year, integrates effectively into the final Freight Hub Perimeter Road and effectively facilitates the transport of freight from the North East Industrial Zone into the Freight Hub.
  - e. Ensuring the integration of the Freight Hub's proposed roading network with PNCC's existing roading network and the future planned Palmerston North Integrated Transport Improvements (PNITI), specifically the provision of a Regional Freight Ring Road and

connection between Palmerston North, Bunnythorpe and Feilding, and the North East Industrial Zone (including the Extension Area).

3. The Freight Hub proposal as notified has the potential to significantly affect the management of PNCC's existing three waters and roading services and the optimised delivery of future upgrades to the networks. KiwiRail has acknowledged in the NOR application that to develop the Freight Hub site, some PNCC roads will need to be stopped, some assets located within the roads relocated and/or replaced and the extent of the existing water bore facility site to be reduced. These matters must be addressed and resolved through the NOR process so that PNCC is able with certainty to undertake their statutory duties relating to service delivery under the Local Government Act.
4. For several months PNCC infrastructure has been working collaboratively with the KiwiRail project team, on the development of a Project Agreement (PA) which sets out each party's obligations in relation to the matters listed above. The PA is in draft form and still under negotiation, although the parties intend to have an agreement executed prior to the hearing.
5. PNCC infrastructure is therefore looking for assurances through the NOR process that issues of importance to PNCC's infrastructure assets will be resolved should the PA not be executed. If they are not, then the risk is for the NoR to adversely affect public infrastructure assets to such an extent that effective service delivery may be compromised.

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## 2 Introduction

6. My full name is Robert Van Bentum. I hold the qualification of B.Agr.Sc (Engineering), M.Phil (Civil Engineering), CPEng (Civil and Environmental).
7. I am a professional engineer with more than 20 years of experience in three waters and public transportation infrastructure.
8. I have prepared this evidence on behalf of the determining authority, Palmerston North City Council, in relation to the Notice of Requirement (NoR) for the KiwiRail Regional Freight Hub ("the Freight Hub") lodged by KiwiRail Holdings Ltd ("KiwiRail"). I understand that my evidence will accompany the planning report being prepared by the determining authority under section 42A of the Resource Management Act 1991 (the "Act").
9. I currently hold the position of Chief Engineer providing engineering advice to the full range of engineering activities undertaken by the Infrastructure Unit of Council. This includes providing advice to senior executive leadership and elected members. I previously held the role of Manager – Transport and Infrastructure for 4 years with responsibility for more than 60% of Council infrastructure capital and operational budgets.
10. I have been involved in a wide range of local government capital and operational programming for Councils both as an external consultant and in the last 6 years as a Council officer. My specific engineering expertise is largely in 3-waters but I have had project and programme responsibility for Transport programmes of work for local authorities and NZTA (Waka Kotahi).
11. As Manager of the Transport Activity in the Infrastructure Unit I have been responsible for representing Council in all the major strategic roading programmes of work over the last 5 years. This has included engagement with neighbouring TAs and Waka Kotahi with the regional roading work programme (Accelerate 25), the regional freight ring road (PNITI) as well as Council's own programme of work (Urban Cycling Masterplan, Road to Zero and Low Cost Low Risk programme).
12. In my current role I am responsible for assisting in the development of consistent and robust design standards and approaches as well as providing technical advice and oversight to major strategic projects such as PNITI.

## **3 Background and Scope of Evidence**

### **3.1 Background**

13. KiwiRail is seeking to designate approximately 177.7 hectares of land between Palmerston North Airport and Bunnythorpe for a new Regional Freight Hub.
14. The Freight Hub will consist of a centralised hub incorporating tracks, marshalling yards, maintenance and service facilities, a train control and operation centre, freight handling and storage facilities (including for logs and bulk liquids), provision of access, including road and intersection upgrades where required, and specific mitigation works including noise walls/bunds, stormwater management devices and landscaping. In addition, the North Island Main Trunk rail line will be relocated to sit within the new designation area and directly adjacent to the Regional Freight Hub. The activities that take place at KiwiRail's Tremaine Avenue freight yard (apart from the passenger terminal and the network communications centre) will be relocated to the new site to form part of the new Regional Freight Hub.
15. A detailed description of the Project is set out in 6.3 of the AEE submitted by KiwiRail and a summary description in the s42A Planning Assessment.

### **3.2 Scope of evidence**

16. I have been asked to assess the NoRs impact on PNCCs three waters, roading and walking and cycling existing infrastructure and future strategic networks. My evidence defers to the evidence of other experts in respect of the detail of impacts of the hub on Council services. My evidence instead considers the following matters:
  - a. PNCCs existing and future planned infrastructure projects and programmes as they will or may be impacted by the Freight Hub proposal.
  - b. An update of discussions held with KiwiRail in seeking to secure a Project Agreement (PA) in respect of the Freight Hub and its impact on Council services.
  - c. Submissions relating to PNCCs three waters, roading and walking and cycling infrastructure.
  - d. Any other matters.

17. My evidence should be read in conjunction with expert evidence of the other experts that have contributed to the s42A Planning Assessment. In particular, the evidence of Ms Copplestone, Ms Fraser and Mr Vuletich are relevant to the consideration of matters I address.

### **3.3 Reports and material considered**

18. As part of preparing this statement of evidence, I have read the following reports and documents:
- a. NoR application.
  - b. Response to Further Information request dated 28 May 2021.
  - c. 42 Report on Planning by Ms Copplestone.
  - d. S42 Report on Traffic Effects by Ms Fraser.
  - e. S42 Report on Economics Effects by Mr Vuletich.
  - f. Memorandum by David Murphy dated 24<sup>th</sup> May 2021 outlining the relevant Strategic Planning Context.

### **3.4 Site visit**

19. I undertook a site visit on 10<sup>th</sup> June 2021 to the area covered by the NOR and I am familiar with the surrounding environment based on my involvement with a range of Council projects in and around the NOR site.

### **3.5 Statutory Context**

20. The relevant statutory documents and provisions relevant to the evaluation of the NoR have been set out in the s42A Planning Assessment. For the purposes of preparing this evidence, I have had particular regard to the following statutory provisions and direction that are particularly relevant to the topic area I address.
- PNCCs Long Term Plan 2021-2031.
  - Palmerston North City District Plan within respect to the strategic planning direction for the North East Industrial Zone and Extension Area.
  - The Regional Land Transport Plan 2018-2021.
  - PNCC's Strategic Transport Plan (2018/2021).

- Active Public Transport Plan (2018/2021).
  - The Manawatu-Wanganui Joint Transportation Study (2010).
21. The key elements of each of these documents have been addressed by the report of Ms Copplestone and Ms Frasier and for the purposes of my evidence I adopt those assessments.

## **4 Project Agreement with KiwiRail**

22. Over several months my team have been meeting and working with KiwiRail to develop a PA that sets out both KiwiRail and PNCCs obligations in relation to the assets and the services these assets provide that will be impacted by the NoR. Specifically, the PA recognises that the Freight Hub will impact upon PNCC assets and services in the following ways:
- a. require the stopping of paper and formed PNCC roads;
  - b. require the relocation of PNCC assets contained in the roading corridors;
  - c. remove the existing access and the southern corner of the existing PNCC owned site of the Palmerston North water bore facility at the intersection of Roberts Line and Railway Road;
  - d. require road integration works, including a small extension at the Richardson/Roberts Line intersection for traffic management.
  - e. Cause disruption to and temporary closure of the Palmerston North to Feilding shared pathway along the eastern side of the existing railway lines.
23. The PA sets out the overarching terms for any required road stopping, services and roading design, construction of works, health and safety provisions, costs and the requirements of giving effect to the designation if granted. It also requires each party to work collaboratively, in particular in relation to the integration of any proposed new roads to the wider regional road network. The PA makes clear the obligations of each party and where costs will fall.
24. PNCC has agreed to the PA essentially to protect its interests with respect to both current and future infrastructure and its statutory responsibilities for service delivery. The PA will ensure that should the NoR be approved, PNCCs existing and any planned services are protected, and that any required road stopping or relocation of existing services is carried out to the appropriate standard,

and at no cost to PNCC. The obligations include securing any necessary resource consent approvals, notice of requirements, outline plan waivers, engineering approvals and certification of plans. Road or level crossing closure will also need to be carried out following proper process.

25. Within the PA, PNCC works are defined as all works to be undertaken by KiwiRail (or undertaken at KiwiRail's cost) on PNCC assets in relation to the Project, including:
  - a. road stopping processes and related physical works;
  - b. pipes/services relocations and connections i.e. water and wastewater networks;
  - c. street furniture and services relocations i.e. bus stops, crossing places;
  - d. works required to integrate new Hub access roads with the existing PNCC's designated road network and the planned PNITI regional roading network;
  - e. vesting and maintenance of new road (replacement Railway Road/ perimeter road);
  - f. provision of an alternative shared pathway between Palmerton North and Feilding should the NoR require any temporary or permanent closure of the existing pathway alignment once completed.
  - g. provision of replacement land for water supply storage purposes and a replacement access to the water bore site; and
  - h. design and consents development (to the extent required) for replacement of PNCC assets and road integration works.
26. PNCC's objectives for the Project in the context of the PA are to:
  - a. avoid incurring costs in relation to the PNCC Works (other than as otherwise set out in the Agreement), being works required as a consequence of the Freight Hub; and
  - b. integrate the Project safely and efficiently into the local road network as well as ensure any new roading infrastructure integrates with the wider strategic roading network and particularly PNITI;
  - c. effect continuity of service and efficient relocation of any PNCC Infrastructure;

- d. ensure reasonable access is provided to PNCC in relation to the existing bore facility located at Roberts Line; and
  - e. provide for the future expansion of the water bore and storage facility and for permanent maintenance and servicing access to the same.
27. It is my expectation that appropriate conditions will be placed on the NoR should it be granted that protect PNCC's infrastructure assets and planned projects from impacts caused by the NOR. I consider the final Freight Hub design should fully integrate with PNCC's roading and walking and cycling network and make provision for water supply and wastewater service provisions, specifically considering:
- the Palmerston North Integrated Transport Initiative (PINITI) including the Regional Freight Ring Road
  - the bypass of Bunnythorpe on the Ashhurst to Feilding and Palmerston North to Feilding transport corridors
  - the Palmerston North to Feilding shared pathway and shared off-road pathways and connections within the North-East Industrial Area
  - Railway Road bore site complete with storage and treatment facilities and
  - Water supply and wastewater network services for Bunnythorpe, the Kiwirail Hub and the north-east area.

These matters are discussed in further detail below.

## **5 Palmerston North Integrated Transport Improvements**

28. Waka Kotahi NZTA has completed the preparation of a Programme Business Case (PBC) for a package of roading interventions collectively known as the Palmerston North Integrated Transport Initiative (PNITI) project. The PBC has been formally approved by Waka Kotahi's board allowing a number of the discrete projects and work packages to be advanced to more detailed business case planning and/or implementation. PNCC have included several PNITI projects in its capital funding request for the first 3 years of the 2021-24 RLTP.
29. The centrepiece of PNITI is the Regional Freight Ring Road (Ring Road) which will run around the outskirts of Palmerston North, connecting key industrial

areas including the NEIZ and proposed KiwiRail Freight Hub, Feilding and state highways to the north, Longburn and Wellington connections to the south and the new Manawatu Gorge highway to the east. The Ring Road will be a purpose-built arteria route, developed as a combination of new roads and upgrades to existing roads.

30. The Ring Road responds to pressures that have arisen primarily as a result of:
- a. Rezoning of industrial areas on outskirts of the city close to regional road linkages, the airport and rail connections;
  - b. The emergence of Palmerston North as a regional freight and logistics centre requiring easy and efficient access for heavy road transport to warehousing, rail and airport facilities;
  - c. Significant growth and development of residential development within the city resulting in financial and efficiency drivers for commercial businesses to relocate to new industrial growth areas;
  - d. the existing KiwiRail rail yard being located in an area that is flanked by residential zones and subject to increasing traffic congestion impacting of efficiency of freight movement;
  - e. deficiencies in the existing roading network on the outskirts of the city, e.g. narrow roads, weight-restricted bridges, etc.; and
  - f. the highly porous nature of the Palmerston North roading network which allows a wide range of vehicles to use all streets in the absence of engineering and speed management to encourage them to use more appropriate routes.
31. As a consequence of the above changes and deficiencies, there are growing numbers of heavy vehicles using streets in residential and commercial areas to travel between industrial zones. This is causing problems of safety, traffic congestion, loss of connectivity (severance), reduced uptake of walking and cycling, and a general loss of amenity in affected areas.<sup>1</sup>
32. By providing a safer, more efficient road network that redirects freight traffic around rather than through the city, the Ring Road is expected to alleviate

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<sup>1</sup> See, e.g. Waka Kotahi NZTA PNITI Network Options Report, p.11.

many of these problems and enable important social and economic benefits for the region.

33. From a social perspective, the Ring Road will reduce travel times for users of decongested roads, improve actual and perceived safety, increase opportunities for walking and cycling, and lift amenity values in residential and commercial areas.
34. The Ring Road is a critical enabler of several important placemaking initiatives that rely on removal of trucks from the inner city. Key among these is the City Centre Revitalisation project ("Streets for People") which aims to transform the City Centre from a vehicle-centric space into a vibrant, people-friendly commercial and entertainment hub where people want to spend time. Other examples include the Urban Cycle Network Masterplan and multiple residential growth projects located on arterials that are currently used as freight routes.
35. From an economic perspective, the Ring Road is expected to reduce accident rates and travel costs for businesses, making them more productive and strengthening the region's reputation as an attractive place to do business. There are several major economic development projects planned or underway that will be significantly enhanced by the Ring Road. These include the Central NZ Distribution Hub, the FoodHQ Science Park, growth in the Longburn Industrial Estate, and Linton Army Base regeneration.<sup>2</sup>
36. The removal of heavy vehicle traffic from the city's collector and arterial road network even in the short term will have significant benefits in terms of reduced long run network operating and maintenance costs. The heavy vehicles are the major contributor to the damage occurring on the city's collector and arterial network both because of the loads carried and because many of the streets were never designed for the heavy vehicle loads being imposed. The majority of Council's limited pavement maintenance budget in the next few years will be targeted to maintaining this part of the network.
37. Council has committed significant funding in the proposed 2021-31 Long Term Plan to advance key elements of the strategic network and develop the key roading network to support development in this part of the city. The funding

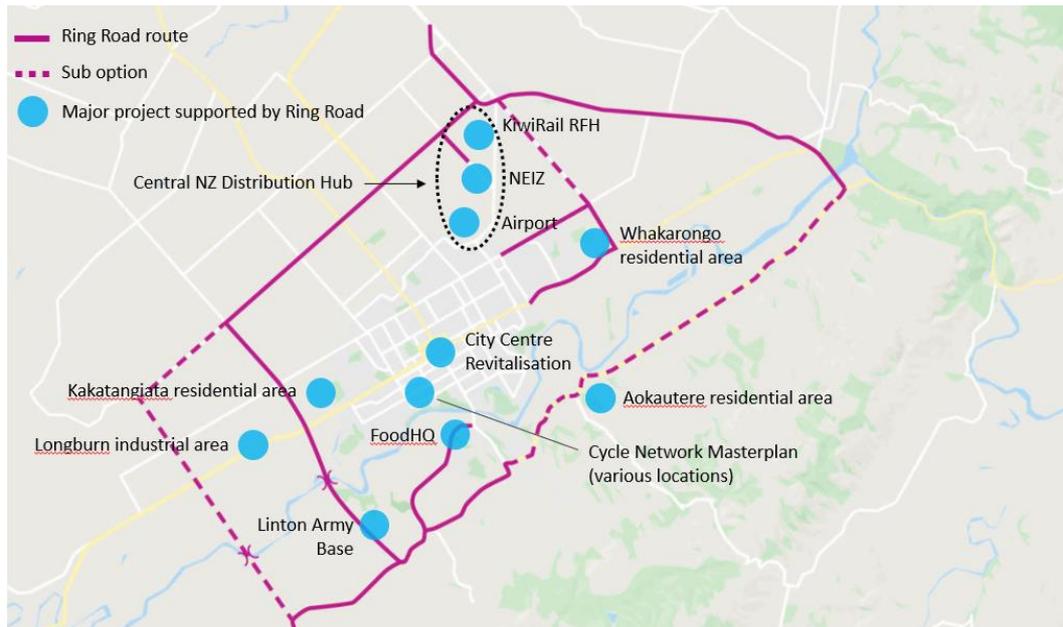
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<sup>2</sup> See, e.g., Waka Kotahi NZTA PNITI Network Options Report, Table 14-2, p. 100 (Alignment to PNCC Strategic Direction and Vision).

includes a range of short term safety measures, intersection upgrades and bridge replacements to activate Kairanga Bunnythorpe Road as a freight route for existing businesses in the city and new development in the north-east. These programmes include:

- Programme 115 Sealed Pavement Renewals – Bunnythorpe Roundabout – 2022-23
  - Programme 1362 Roberts / Railway Intersection Safety Improvements – 2021-22
  - Programme 1472 Business Case Work for Strategic Roads – 2021-2024
  - Programme 1691 Road to Zero Transport Safety Improvements – 2021-2024
  - Programme 1695 PNITI Bridge and Intersection Improvements – 2021-2024
  - Programme 1932 Urban Transport Improvements - Enabling PNITI – Business Case – 2021-24
  - Programme 2009 Transport Advanced Investigations – 2021-2024
  - Programme 2013 PNITI Strategic Transport Corridor Improvements – 2022-2024
  - Programme 2059 Urban Transport Improvements – Enabling PNITI - 2021-2024
  - Programme 2058 Urban Growth – NEIZ – Transport – 2021-2024
38. Overall, the Ring Road is seen as a transformational project that will increase productivity, inward investment and employment in the region while also driving significant improvements in social wellbeing. Figure 11 shows the indicatively planned Ring Road route and some of the major projects that will be enabled or supported by the Ring Road.

Figure 1 Examples of major projects supported by the Ring Road

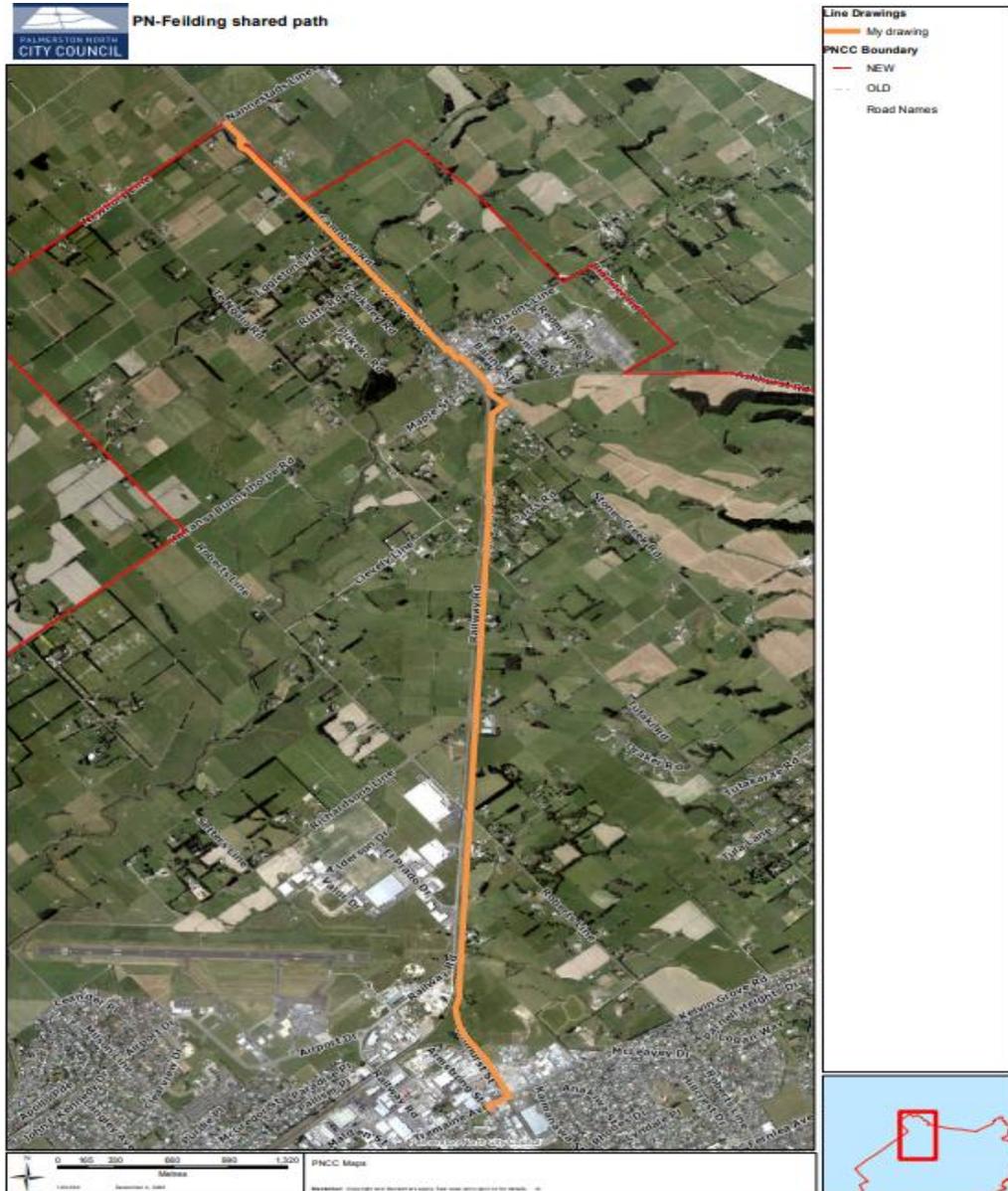


## 6 Shared Walking and Cycling Pathway Between Palmerston North and Feilding

39. Improving active mode connectivity between the two communities of Palmerston North and Feilding has been under investigation since 2005, and prior to commencing this Single Stage Business Case for a shared path between the two communities a Strategic Case was completed by Beca on behalf of PNCC and MDC in June 2018.
40. For a number of years PNCC have had aspirations for a shared walking and cycling pathway between Feilding and Palmerston North to support a multi-modal integrated transport system. PNCC, in partnership with the Manawatu District Council (MDC) and Waka Kotahi committed to a business case to explore and ultimately secure funding for its construction through the National Land Transport Programme (NLTP). The walkway was included in the 2018-2021 RLTP and funding has been set aside in the 2021-2031 Long Term Plan for its construction. MDC have started construction of their section from Feilding toward Bunnythorpe.
41. PNCC have identified their preferred alignment for their portion of the shared pathway and begun design work for the section from the city through to Bunnythorpe. Provided currently approved Waka Kotahi funding is reconfirmed through the 2021-24 RLTP, then construction work will begin on this

section in the 2021-22 financial year (year 1 2021-31 LTP). The pathway's alignment is show in **Figure 2** below.

Figure 2 – Palmerston North to Feilding Share Pathway alignment



42. The pathway will generally follow the existing Te Araroa walking trail from Midhurst Street to the intersection of Waughs and Campbell Roads north of Bunnythorpe along the eastern side of the existing railway line (Sangsters Road and an existing paper road). It will connect through Bunnythorpe and across the Mangaone Stream and its tributary with the exact location of the crossings to be confirmed.

43. The preferred corridor is across some existing KiwiRail owned land (at its southern end) which is outside the NoR area. PNCC have been working with KiwiRail' property team to secure a license to occupy this land. Council are seeking early resolution of this matter and a decoupling of this project from the NoR.
44. The preferred alignment overlaps with the eastern extent of the Freight Hub footprint for the section from Roberts Line to Stoney Creek Road as the Nor extends over the current legal and paper roads). This needs to be clarified as it will impact on the shared path which PNCC is constructing in the next 2 years.
45. We have understood from our discussions with KiwiRail that if the shared pathway were constructed, that when it came time to develop the Freight Hub there may be some disturbance to the shared pathway due the potential requirement for construction of a bund to provide visual and noise screening of the Freight Hub from adjacent properties to the east. It is our expectation that any disturbance would be minimal and that an appropriate temporary solution during construction and permanent solution on completion would be provided maintain connectivity along the shared pathway.
46. Previous discussions with Kiwirail have identified a possible option for the pathway to be constructed along the top of the bund to provide users with views into the railyard. This is however not a requirement from Council.
47. In addition to the Palmerston North to Feilding shared pathway facility, Council is committed to providing active transport links to and from the North East Industrial Zone. This includes an extension of the existing Mangaone shared pathway from its current end point on Flyers Line all the way to Bunnythorpe.
48. To that end all Council's roading projects and re-zoning include the provision of shared path connections. The proposed upgrade of Richardson's Line will incorporate a separated shared pathway 2.5 m in width along the north-western edge of Richardson's Line. In addition, connecting sections along Robert's Line and Setters Line will be provided as far as the Mangaone Stream to connect to a future shared path. Other connections will be provided back to Railway Road and into the previous NEIZ via Aldersons Drive.
49. We note that the proposal includes a footpath along the western edge of the proposed perimeter road. Council's minimum requirement is a separated shared path of at least 2.5 m width to keep active transport users separate

from heavy vehicle traffic. Any future intersection treatment at the Richardsons and Roberts Line intersection will also need to incorporate this shared pathway to ensure safe connections north along the proposed perimeter road, and south along the perimeter road to where it connects with Railway Road.

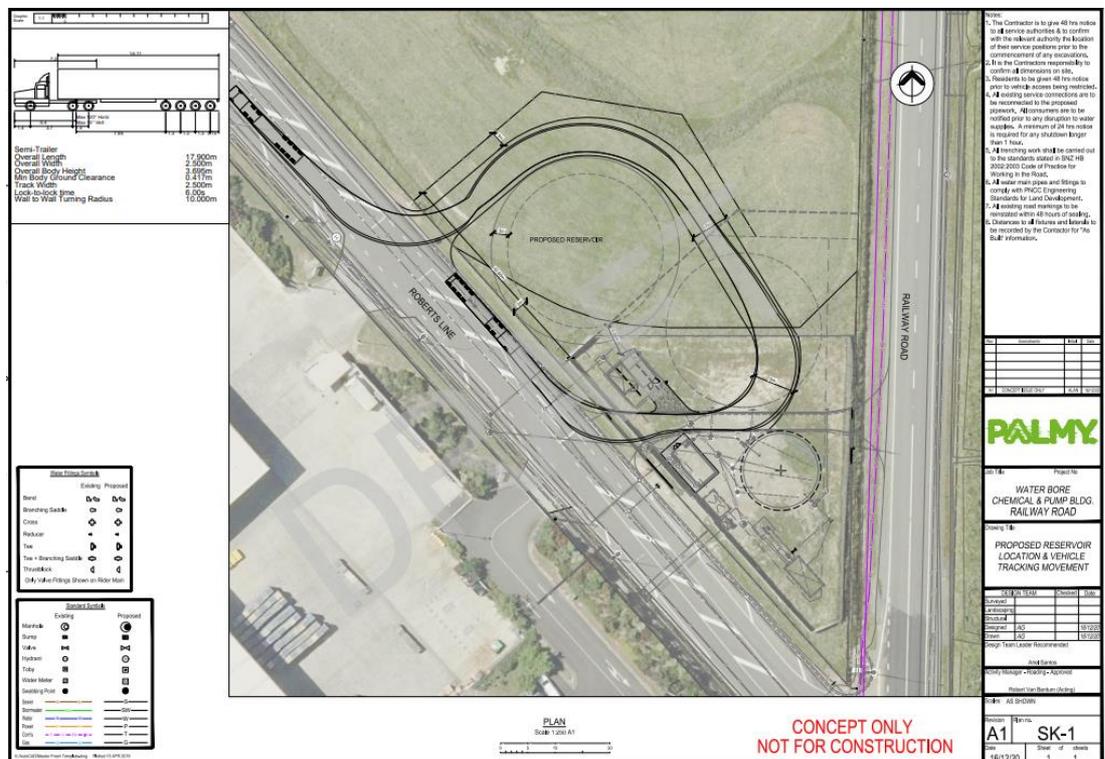
50. In addition, Council wishes to preserve the connection for active transport users between both sides of the railway line. Our expectation would be that there was a connection across and preferably under the railway lines to connect with the proposed Palmerston North to Feilding shared pathway.

## **7 Water Bore Reservoir**

51. PNCC owns a groundwater bore, treatment plant and storage reservoir located at the intersection of Railway Road and Roberts Line over which the Rail Freight Hub designation will fall. The purpose of this facility is to provide water supply in the north eastern part of the city. Future development of the facility includes the construction of a second storage reservoir and chemical treatment facilities.
52. The Railway Road bore facility is a critical part of the future water supply for the north-eastern area of Palmerston North. The bore will provide security of supply for the northern part of the city throughout the year and supplement supply to the rest of the city during drought conditions when the Turitea Storage Dam is at low levels. It will also be the predominant water supply for the North-East Industrial Zone, the KiwiRail freight hub, their freight partners, two major food distribution centres which are of national significance, and ultimately the town of Bunnythorpe when it is connected to the city network.
53. If PNCC were to retain its current landholding, and the KiwiRail freight hub went ahead in its current intended form without the provision of this facility, this would mean that PNCC would not be able to accommodate the second reservoir. in the future. This would have implications on resilience for our customers reliant on water supply in the area, and on operation of the bore (including cost and reliability).
54. The bore, current reservoir facility and ancillary chemical storage buildings, including the second reservoir, are considered infrastructure of regional importance under Policy 3-1 of the Regional Policy Statement. This is covered in more detail in Ms Copplestone's evidence.

55. We understand from our discussions that KiwiRail do not require Council to relocate this bore (which would be at considerable expense) and can accommodate their development by taking a small portion of Council's site on the Railway Road side of the site. Not only does this require a change to the location of the proposed reservoir but it also necessitates a change to site access arrangements for chemical delivery vehicles. The reduction in area, possible obstruction associated with the proposed future reservoir and altered access requirements have been discussed at length with KR. We understand KiwiRail is supportive of relocating the future expansion of the facility and providing alternative access along the road frontage with Roberts Line. The future expanded facility is shown in **Figure 3** below.

Figure 3 – Bore and Future Reservoir Facility



56. We have communicated to KiwiRail that this will be acceptable provided Council's current asset and future interests are protected.

57. Construction has commenced on the pump station and the chemical storage buildings. Work on the foundations is almost complete, pumps have been purchased and fabrication of pipework is underway. This work is being done in parallel with a contract to provide water treatment equipment and systems. Completion of both contracts, and subsequent commissioning, is scheduled for October/November this year. Once commissioned, chlorinated and

fluoridated water from the bore will be pumped into the PNCC reticulation already existing in Roberts Line, supplementing the existing supply to the North East Industrial Zone.

58. PNCC has not designated the current bore, existing reservoir and the two new buildings currently being constructed (pump station and chemical treatment). It is my understanding that KiwiRail requires the use of this area for the realignment of the main trunk lines into the Freight Hub. We have therefore been in discussion with KiwiRail over the option of relocating the proposed reservoir on a site north west of the existing facility (closer to Roberts Line) so that the reservoir can be constructed without impacting the relocated rail lines. Council has yet to secure this agreement, and until such time as it does, it is critical that any decision made on the NoR does not impact on Council's existing facility and proposed expansion.
59. In summary Council seeks:
  - a. That PNCC's future plans to construct a second reservoir and chemical treatment facilities will not be impacted by the proposed NoR.
  - b. That future access to the water bore site is provided as part of the final roading and access design and arrangement so that the facility can be serviced, and chemical treatment resupply undertaken.
  - c. That PNCC's plans to construct a future reservoir tank for security of supply adjacent to the existing bore and reservoir facility be protected.
  - d. Appropriate conditions on the NoR that provide for the future expansion of the bore facility into KiwiRail owned land as per the plan in Figure 3 above.

## **8 North East Industrial Zone Upgrades**

60. As part of facilitating land use expansion and growth in the North East Industrial Extension Area, Council has approved funding under Programme 2058 Urban Growth – NEIZ – Transport to construct supporting roading infrastructure. Additional programmes have been approved to fund water supply and wastewater upgrades.
61. The transport programme includes funding for upgrading Richardsons Line along the southern extent of the zone from the intersection with Roberts Line

south west to just west of the intersection with Setters Line. In addition, the programme includes funding of an upgrade to Setters Line and the Roberts Line / Richardson Line intersection. In recent months PNCC has come under increasing pressure to provide the necessary services for the development of this land. As a result Council has initiated the detailed design with the intention of tendering the work for construction in the 2021-22 FY.

- 62. PNCC is required to meet a specific level of service for Richardsons Line based on the indicative cross-section determined through the structure plan process. This is shown in **Figures 4 and 5** below.

Figure 4 – Proposed Richardsons Line Upgrades

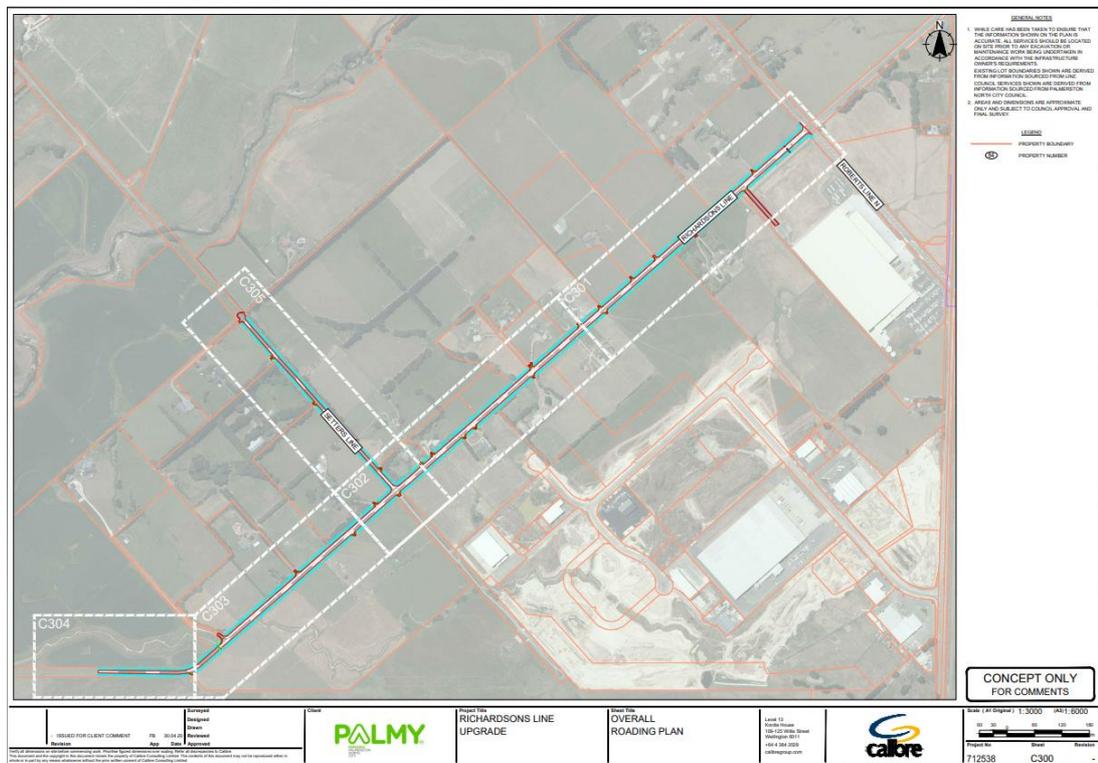
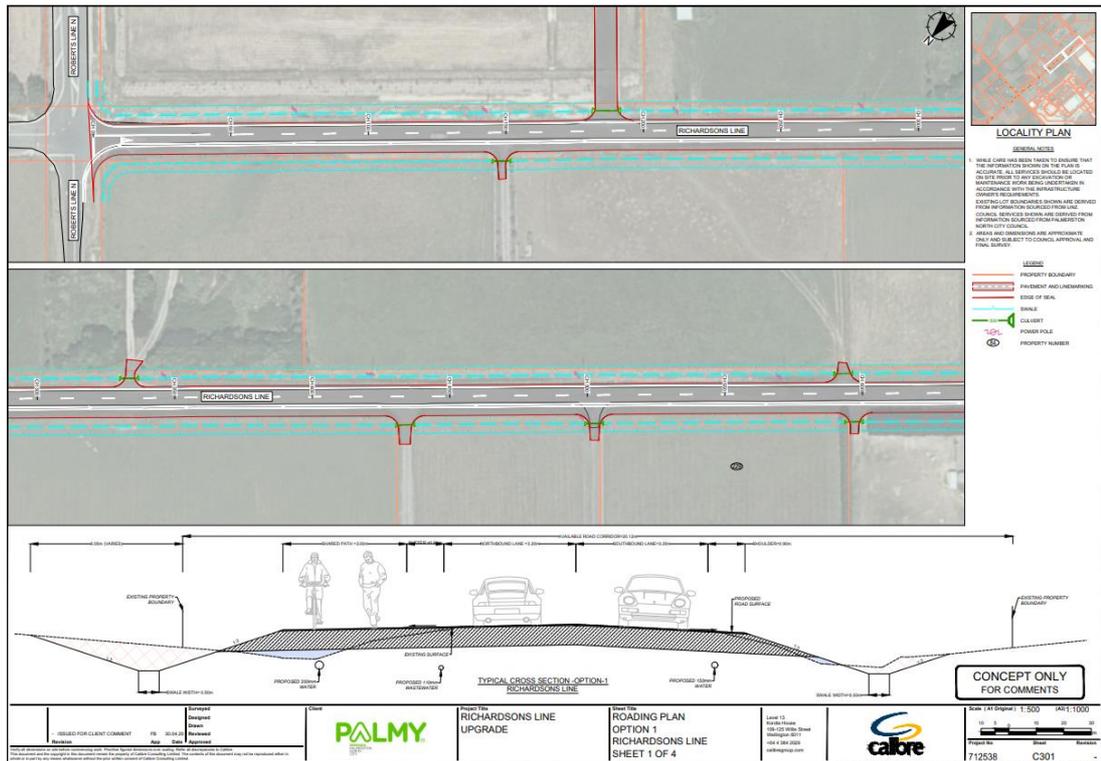


Figure 5 – Cross section of Richards Line proposed upgrades



63. The level of service includes a separated shared pathway along the northwest edge of Richards Line. The design also includes a roundabout at the Richardson's Line and Roberts Line intersection.
64. I acknowledge that the NoR by KiwiRail does include a roundabout at this intersection to link to the proposed southern entrance to the perimeter road and Freight Hub. PNCC's proposed design is intended to provide for vehicle movements in the area as currently envisaged. It is Council's expectation that the roundabout will need to be modified and upgraded to serve the Freight Hub development and cope with any additional traffic generated as a result of new development in the North East Industrial Zone Extension Area at KiwiRail cost. Initial conversations with some landowners and developers, indicate a desire to provide for a central transport logistics hub within the NEIZ with the ability to efficiently transport modular freight into and out the Kiwirail Hub and the airport without unnecessary handling. Council is helping with an assessment of the strategic options to realise this vision.

## 9 Review of submissions

65. I have reviewed the submissions and provide comments below.
66. One of the submitters (#72 Danelle O’Keeffe & Duane Butts) has raised the issue of the Freight Hub potentially contaminating groundwater, specifically noting that a risk assessment has not been carried out to assess the potential for contamination of the PNCC bore.
67. PNCC infrastructure, and Horizons at the appropriate time Regional Council consents are sought, will expect KiwiRail to demonstrate that the aquifer and water supply bore will be appropriately protected from any risk of contamination.

## 10 Conclusions

68. In summary, PNCC infrastructure expects the following:
  - a. Protection of the ongoing operation and potential future upgrade and expansion of PNCC’s groundwater abstraction and reservoir site located at the intersection of Railway Road and Roberts Line;
  - b. That the current operation and future upgrades of existing and planned 3-waters services and in particular connections between Palmerston North and Bunnythorpe are secured and provided for;
  - c. That the planned construction of a shared walking and cycling pathway between Palmerston North and Feilding through Bunnythorpe along the eastern side of the railway line is facilitated and any impacts from the Freight Hub are effectively mitigated;
  - d. Ensuring that the proposed upgrade of Richardson’s line, which is programmed to be undertaken later this calendar year, integrates effectively into the final Freight Hub Perimeter Road and effectively facilitates the transport of freight from the North East Industrial Zone into the Freight Hub.
  - e. The integration of the Freight Hub’s proposed roading network with PNCC’s existing roading network and the future planned Palmerston North Integrated Transport Improvements (PNITI), specifically the provision of a Regional Freight Ring Road and connection between Palmerston North, Bunnythorpe and Feilding, and the North East Industrial Zone (including the Extension Area).

69. Although PNCC infrastructure is entering into a Project Agreement with KiwiRail to ensure that these matters will be addressed, that agreement is not yet finalised and so for the purposes of the NoR hearing, it is our expectation that appropriate conditions are imposed on the NoR that fully address these matters and protect the existing and future planned and integrated roading, walking and cycling and three-waters assets.

A handwritten signature in black ink, appearing to read 'R. van Bentum', with a stylized flourish at the end.

Robert van Bentum

18 June 2021