

# KiwiRail Holdings – Palmerston North Regional Freight Hub - S92 Requests and Responses – Planning

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## Introduction

This memo covers the response to Queries 52, 170,171, 173, 177, 179- 186

**Q 52. Please provide an assessment of the proposal in relation to the relevant objectives and policies of Chapter 6 of the Horizons One Plan, including Objective 6.2 and Policies 6-8 and 6-9, and relevant provisions of the RMA, including Part 2.**

HORIZONS ONE PLAN CHAPTER 6	PLANNER COMMENT
<p>Objective 6-2: Outstanding natural features and landscapes, and natural character</p> <p>(a) The characteristics and values of:</p> <p>(i) the Region's outstanding natural features and landscapes, including those identified in Schedule G, and</p> <p>(ii) the natural character of the coastal environment, wetlands, rivers and lakes and their margins are protected from inappropriate subdivision, use and development.</p> <p>(b) Adverse effects, including cumulative adverse effects, on the natural character of the coastal environment, wetlands, rivers and lakes and their margins, are:</p>	<p>Part 2 of the RMA is assessed in section 10.5 of the AEE as lodged. Other relevant Horizons One Plan Objectives and Policies are assessed in section 10.1.5 of the AEE. Objective 6-2 and related policies are identified and assessed as a whole in section 10.1.5. The following is an assessment of individual parts of objective 6.2 and policies 6-8 and 6-9 specified in question 52. The starting point in terms of assessing Objective 6-2 is as noted in the AEE – that there are no outstanding natural features and Landscapes identified in Schedule G1 of the One Plan in the context of the designated area or the immediate context.</p> <p>Since lodging of the Notice of Requirement and in response to the s92, further site investigations have been undertaken.</p> <p>No wetlands have been identified within the designation extent in the sites that have been able to be accessed. With respect to sites</p>

HORIZONS ONE PLAN CHAPTER 6	PLANNER COMMENT
<p>(i) avoided in areas with outstanding natural character, and</p> <p>(ii) avoided where they would significantly diminish the attributes and qualities of areas that have high natural character, and</p> <p>(iii) avoided, remedied or mitigated in other areas.</p>	<p>that have not been able to be accessed that may contain wetlands, it is considered that there is sufficient space within the designation extent to be able to sufficiently and successfully manage effects applying the effects management hierarchy as directed under clause 3.21 of the NPS.</p> <p>Therefore, the focus in this assessment is what are the natural character, characteristics and values of possible wetlands and those streams that fall under the definition of river in RMA. It is also relevant to consider how the characteristics and values present in terms of the land that the Freight Hub will be developed on are affected and whether adverse effects are able to be avoided where they would significantly diminish the attributes and qualities of areas that have high natural character, or otherwise remedied and mitigated.</p> <p>The ecological assessment states that any wetlands are likely to have low ecological value because they are likely to be dominated by exotic species, are small, and will not be indigenous-representative wetlands. This suggests that they do not have high natural character. The assessment of the streams is that the watercourses are in poor quality with no riparian planting and freely accessed by stock, often dry out and probably suffer from severe pollution and therefore have poor existing habitat quality and have fish passage difficulties. Again this suggests that they do not have high natural character. Therefore, the focus of this assessment is on (b) (iii). In terms of (b) (iii) it is noted that the impact on the natural character and values is largely related to the change in landform and the impact of development and land use on the existing watercourses through the area. The Freight Hub will involve a substantial amount of construction and a change of land use and this will result in adverse effects on natural character. However, these effects must be considered within the context of the existing environment, which identifies the watercourses as having both low ecological</p>

HORIZONS ONE PLAN CHAPTER 6	PLANNER COMMENT
	<p>value and low natural character, and any potential wetlands as having low ecological value (and therefore likely to have low natural character). The impact on the existing streams is directly related to the need to culvert them as part of the development of the land so that the watercourses either pass under the operational area or are diverted to locations where they can be formed as open channels. There are hydrological, ecological and landscape effects that need to be addressed as a result of the proposed development. The design of the culverts and streams are expected to be consistent with the New Zealand Fish Passage Guidelines and sized and positioned to allow water through the site in a manner that avoids causing upstream flooding.</p> <p>Due to the operations of the Freight Hub, open channels are only appropriate in areas of the site where entry of contaminants into the water can be managed, such as through having sufficiently wide planting buffers or otherwise ensuring that the water is sufficiently far away from Freight Hub operations.</p> <p>The culverts if designed to the appropriate guidelines will provide in the project ecologist's opinion better passageway for fish through the site as well as potentially a better resting/inhabiting habitat in the culverts than currently exists. This means that the effects in terms of fish passage values will be mitigated. Other mitigation proposed such as including a naturalised channel, the stormwater ponds and extensive planting around the stormwater ponds to form wetlands to allow sediment to settle, along with integration of mitigation planting will result in the provision of new habitats and any downstream effects being mitigated.</p> <p>In terms of landscape effects, the LVA noted that the stream tributaries flowing into the Mangaone Stream have low and very low natural character. Therefore, the effects of culverting and diverting these streams will be mitigated by the proposed planting and landscaping.</p>

HORIZONS ONE PLAN CHAPTER 6	PLANNER COMMENT
	<p>The use of the hub will in the future be 24/7 and due to the need to ensure the operational yard and roads are lit for the safety of the workers there will be lighting impacts on natural character. The effects of the lighting are able to be managed through detailed design.</p>
<p>(c) Promote the rehabilitation or restoration of the natural character of the coastal environment, wetlands, rivers and lakes and their margins</p>	<p>It is anticipated that any wetlands present within the Designation extent and most of the streams within the Designation extent will be modified by the works, but any wetlands identified are expected to be of low ecological value and low natural character (and will be managed in accordance with the effects management hierarchy under the NPS-FM). It is also expected that the following works will be undertaken to promote the rehabilitation or restoration of the natural character associated with the streams</p> <ul style="list-style-type: none"> <li>• a naturalised channel will be constructed to replace the northern most tributary through the site and its margins planted;</li> <li>• the stormwater ponds and their margins, which will hold, treat and convey the stormwater water discharged from the Hub to the Mangaone Stream will be planted</li> <li>• planting is proposed to the margins of the Mangaone Stream</li> </ul> <p>The extent and quantum of planting is still be determined and will be considered at the time of the regional consent and detailed design phase but is indicated in the initiative landscaping plan included with the NOR.</p>
<p>Policy 6-8: Natural character</p> <p>(a) The natural character of the coastal environment, wetlands, rivers and lakes and their margins must be preserved and these areas must be protected from inappropriate subdivision, use and development.</p> <p>(b) The natural character of these areas must be restored and rehabilitated where this is appropriate and practicable.</p>	<p>As noted above, the designation is not located in the coastal environment and there are no lakes. No wetlands have been identified in the sites that have been able to be accessed. For sites that have not been able to be accessed, it is considered that there is sufficient area within the designation extent to manage any identified wetlands in accordance with the effects management hierarchy under the National Policy Statement</p>

HORIZONS ONE PLAN CHAPTER 6	PLANNER COMMENT
<p>(c) Natural character of these areas may include such attributes and characteristics as:</p> <ul style="list-style-type: none"> <li>(i) Natural elements, processes and patterns,</li> <li>(ii) Biophysical, ecological, geological, geomorphological and morphological aspects,</li> <li>(iii) Natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks,</li> <li>(iv) The natural movement of water and sediment including hydrological and fluvial processes,</li> <li>(v) The natural darkness of the night sky,</li> <li>(vi) Places or areas that are wild and scenic,</li> <li>(vii) A range of natural character from pristine to modified, and</li> <li>(viii) Experiential attributes, including the sounds and smell of the sea; and their content or setting.</li> </ul>	<p>for Freshwater Management. Therefore, the assessment in terms of this policy is focused on the natural character of the streams and their margins and relevant attributes. The natural character of wetlands will be considered at the point that any should be identified.</p> <p>As noted in the LVA s 92 response the natural character values of the streams within the Designation extent are assessed as low based on best practice DoC guidance and information provided by relevant discipline specialists for the project.</p>
<p>Policy 6-9: Managing natural character In relation to the natural character of:</p> <ul style="list-style-type: none"> <li>(a) the component of the coastal environment which is not coastal marine area (CMA), and</li> <li>(b) wetlands, rivers and lakes and their margins subdivision, use or development must generally (but without limitation) be considered appropriate if it:</li> <li>(c) is compatible with the existing level of modification to the environment,</li> </ul>	<p>The use and development of the land and the consequential effect on the natural character of the streams and wider area can be considered appropriate as the modification in relation to land zoned NEIZ is largely compatible with the level of modification anticipated under the zoning. There is a functional need for the Freight Hub to be located here and as set out in the AEE no reasonably practicable alternative locations exist. The detailed design of the extensive planting proposed, the specific lighting required to enable 24/7 use of site, design of the culverts and stormwater ponds will be</p>

HORIZONS ONE PLAN CHAPTER 6	PLANNER COMMENT
<p>(d) has a functional necessity to be located in or near the component of the coastal environment which is not coastal marine area (CMA), wetland, river or lake and no reasonably practicable alternative locations exist,</p> <p>(e) is of an appropriate form, scale and design to be compatible with the existing landforms, geological features and vegetation,</p> <p>(f) will not, by itself or in combination with effects of other activities, significantly disrupt natural processes or existing ecosystems, and</p> <p>(g) will provide for the restoration and rehabilitation of natural character where that is appropriate and practicable.</p>	<p>critical as they will mitigate and enhance the natural character around the boundary of the hub and it is considered that the development will not, by itself or in combination with effects of other activities, significantly disrupt natural processes or existing ecosystems.</p> <p>In addition, the proposed planting will provide for the restoration and rehabilitation of natural character.</p>

**Q 170**

***Please provide a plan showing the location/designated extent of each asset listed in Table 5-2: Network Utilities of the AEE, overlaid with the Concept Plan. In particular, please show the location of the transmission line and pylon relative to the operational areas of the Regional Freight Hub.***

The plans showing the location of the assets listed in Table 5-2 is included in Appendix A to this response. In order to show the location of the assets it has been necessary to enlarge the lines depicting the asset on the plan and so the lines on the figures are not to scale. As the assets generally travel beyond the Designation Extent, the location of assets outside the designation is not shown.

***Q 171) Please provide an assessment of any potential effects on existing services/network utilities within the extent of the NoR, including by identifying and addressing the relevant provisions (and existing designations) in the NPSs, Horizons One Plan and Palmerston North City Council District Plan (in section 10 of the AEE).***

National Policy Statement on Electricity Transmission 2008 (NPSET)	Comment
<p><b>Objective 5</b> To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:</p>	<p>As part of the assessment of locations for the Freight Hub, impacts on the electricity transmission network were considered and it was recognised that there would be potential impacts on Hub operation if any part of the electricity transmission network was in the operational yard. It was therefore decided to avoid this potential effect. This has in part been a reason for selection of the current location.</p>

<ul style="list-style-type: none"> <li>managing the adverse environmental effects of the network; and</li> <li>managing the adverse effects of other activities on the network.</li> </ul> <p><b>Policy 10</b> In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.</p>	<p>While there is a transmission line running through the northern end of the Designation Extent and a pylon located in the Designation Extent as noted in the AEE and identified above in Figure 4 in Appendix A, the pylon is outside the operational area of the Hub. This means that the effects are minimised and likely to be similar to the existing effects of the transmission line passing over the North Island Main Trunk Line (NIMT). Effects on the pylon would be limited to those arising from construction of the Perimeter Road and landscaping the area under the transmission line as shown in Figure 5 in Appendix A. The extract from the indicative landscape plan lodged in Appendix C with the NOR shows the area around the pylon is largely grassed. Cross Section 1 (Appendix C to the NOR as lodged also shows the pylon).</p> <p>KiwiRail has spoken with Transpower and Transpower has not raised any issues of concern about effects. As noted in the AEE KiwiRail will keep Transpower informed.</p> <p>The nature of the works will not result in reverse sensitivity effects on the electricity transmission network.</p>
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Horizons One Plan	Comment
<p><b>Objective 3-1: Infrastructure<sup>^</sup> and other physical resources of regional or national importance</b> Have regard to the benefits of infrastructure<sup>^</sup> and other physical resources of regional or national importance by recognising and providing for their establishment, operation*, maintenance* and upgrading*.</p> <p><b>Objective 3-3: The strategic integration of infrastructure<sup>^</sup> with land<sup>^</sup> use</b> Urban development occurs in a strategically planned manner which allows for the adequate and timely supply of land<sup>^</sup> and associated infrastructure<sup>^</sup>, ... (h) ensuring effective integration of transport and land<sup>^</sup> use planning and protecting the function of the strategic road<sup>^</sup> and rail network as mapped in the Regional Land Transport Strategy.</p>	<p>In accordance with Objective 3-1 regard has been given to the benefits of existing infrastructure of regional or national importance through avoiding such existing infrastructure where possible and where this is not possible due to the KiwiRail's specific requirements (linked to the operation of the NIMT and the rail network) working with the affected infrastructure owners/managers to limit or avoid effects on the operation and maintenance of such infrastructure.</p> <p>In accordance with Objective 3-3 the delivery of the Hub is aligning with the strategic plans of PNCC in relation to urban development and the strategic planning of the Government in terms of delivering a land use that will effectively integrate with and protect the function of the NIMT.</p>

**Policy 3-2: Adverse effects<sup>^</sup> of other activities on infrastructure<sup>^</sup> and other physical resources of regional or national importance.**

The Regional Council and Territorial Authorities<sup>^</sup> must ensure that adverse effects<sup>^</sup> on infrastructure<sup>^</sup> and other physical resources of regional or national importance from other activities are avoided as far as reasonably practicable, including by using the following mechanisms:

(a) ensuring that current infrastructure<sup>^</sup>, infrastructure<sup>^</sup> corridors and other physical resources of regional or national importance, are identified and had regard to in all resource management decision-making, and any development that would adversely affect the operation<sup>\*</sup>, maintenance<sup>\*</sup> or upgrading<sup>\*</sup> of those activities is avoided as far as reasonably practicable,

(b) ensuring that any new activities that would adversely affect the operation<sup>\*</sup>, maintenance<sup>\*</sup> or upgrading<sup>\*</sup> of infrastructure<sup>^</sup> and other physical resources of regional or national importance are not located near existing such resources or such resources allowed by unimplemented resource consents<sup>^</sup> or other RMA authorisations,

(c) ensuring that there is no change to existing activities that increases their incompatibility with existing infrastructure<sup>^</sup> and other physical resources of regional or national importance, or such resources allowed by unimplemented resource consents<sup>^</sup> or other RMA authorisations,

(d) notifying the owners or managers of infrastructure<sup>^</sup> and other physical resources of regional or national importance of consent applications that may adversely affect the resources that they own or manage,

(e) ensuring safe separation distances are maintained when establishing rules<sup>^</sup> and considering applications for buildings, structures<sup>^</sup> and other activities near overhead electric lines and conductors eg., giving effect to the New Zealand Code of Practice for Electrical Safe Distances (NZECP 34:2001), prepared under the Electricity Act 1992, and the Electricity (Hazards from Trees) Regulations 2003 prepared under the Electricity Act 1992,

(f) ensuring safe separation distances are maintained when establishing rules<sup>^</sup> and considering applications for buildings,

The following comments build on those already included in the AEE in Section 10, Table 10.1. As noted in the AEE there are a number of infrastructure assets and corridors in the Designation extent - these fall within the definition of Infrastructure contained in Section 2 of the RMA and therefore Policy 3-2 is relevant.

As required under (a) the presence of existing infrastructure has been identified during site selection and development of the NOR and in the assessment of effects. They include the gas transmission pipeline (Figure 3 in Appendix A); the Transpower corridor; and PNCC water bore for water supply (Figure 1 in Appendix A) and wastewater (Figure 2 in Appendix A) and roads. The Te Araroa Trail and the existing cycleway does lie along Railway Road south of Roberts Line. It is noted that there are other roads and assets as well as an airport nearby.

In relation to the second half of (a) and (b) it was not possible to locate the Freight Hub elsewhere. Therefore, KiwiRail communicated with the asset owner/managers during the process of identifying the location and determining the extent of land required to ensure that they were aware of the project and to ensure that KiwiRail was aware of any concerns they may have.

In accordance with (c) KiwiRail avoided effects where there was the potential for incompatibility as part of the site selection process outlined in the MCA reports appended to the NOR. When the preferred site was identified it also sought to avoid incompatibility in the case of the water bore on the corner of Roberts Line and Railway Road by moving the hub to the north. Where it was not possible to avoid locations or alter the designation, in line with (d) KiwiRail is in discussion with asset owners such as PNCC and First Gas to look at remedying effects by relocating assets.

As set out above and in accordance with (e) in the case of the electricity pylon and overhead line, there is expected to be safe separation distances from KiwiRail activities and structures and relocating the transmission gas pipeline will ensure works are in accordance with (f).

<p>structures^ and other activities near transmission gas pipelines eg., giving effect to the Operating Code Standard for Pipelines - Gas and Liquid Petroleum (NZS/AS 2885) and the Gas Distribution Networks (NZS 5258:2003), the latter promulgated under the Gas Act 1992, (g) ensuring that any planting does not interfere with existing infrastructure^, eg., giving effect to the Electricity (Hazards from Trees) Regulations 2003 promulgated under the Electricity Act 1992 and Section 6.4.4 External Interference Prevention of the Operating Code Standard for Pipelines - Gas and Liquid Petroleum (NZS/AS 2885), and</p> <p>(h) ensuring effective integration of transport and land^ use planning and protecting the function of the strategic road and rail network as mapped in the Regional Land Transport Strategy.</p>	<p>The Landscape Plan will ensure that any planting does not interfere with the existing electricity transmission infrastructure and will be in accordance with (g).</p> <p>The project itself is in accordance with (h) as it is looking to protect the function of the strategic road and rail network.</p>
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Palmerston North City Council District Plan	Comment
<p><b>23.3 Objective 2</b> To provide for the operation, maintenance, upgrading and development of existing network utilities of regional or national importance and the establishment of new regionally or nationally important network utilities.</p>	<p>The following comments build on those already included in the AEE in Section 10.</p> <p>The rail network is an existing network utility of regional and national importance as outlined in the AEE and s92 responses. KiwiRail as a network utility is providing for a new regionally and nationally significant rail hub that will be a key part of its network – this is in accordance with Objective 2. The management of any effects from the Freight Hub on existing network utilities of regional or national importance is addressed through the site selection process, KiwiRail’s commitment to ongoing dialogue with the relevant network utilities and through specific conditions, such as the Road Network Integration Plan condition.</p>
<p><b>Policies</b> 2.1 To permit the operation, maintenance and upgrading of existing regionally or nationally important network utilities where such works or activities can be carried out without significantly changing the character, intensity or scale of the adverse effects associated with them. 2.2 To enable the operation, maintenance and upgrading of existing regionally or nationally important network utilities and the establishment of new regionally or nationally important network utilities, provided that the adverse effects are avoided, remedied or mitigated, having regard to: i. the benefit of the works; ii. any functional, technical and operational requirements and constraints; and iii. the way adverse effects have been managed</p>	<p>KiwiRail is looking to move away from its current Tremain Ave location as it is not able to upgrade it in line with changing operating requirements related to freight demands of the future without significantly changing the character, intensity or scale of the adverse effects associated with it. Any upgrade of the existing site would therefore not meet the intent of Policy 2.1.</p> <p>In line with Policy 2.2 KiwiRail is establishing a new regionally and nationally important part of the network and is ensuring that the generated adverse effects of its construction and operation</p>

<p>through the route and site selection process.</p> <p>2.3 To avoid, or as appropriate remedy or mitigate, the potential for adverse effects, including reverse sensitivity effects on regionally or nationally important network utilities from incompatible new subdivision, use or development occurring under, over or adjacent to regionally or nationally important network utilities.</p> <p>2.4 To avoid the establishment or intensification of sensitive activities, incompatible new subdivision, use and development within defined National Grid Yards and National Grid Subdivision Corridors.</p> <p>2.5 To notify owners or managers of network utilities of regional or national importance of consent applications that may adversely affect the resources they own or manage</p>	<p>are avoided, remedied or mitigated having regard to:</p> <ul style="list-style-type: none"> <li>- the benefits arising from the works i.e. being able to operate 24/7 to meet the anticipated freight growth);</li> <li>- addressing the functional, technical and operational requirements and constraints (for example the required RL for the yard relative to the NIMT);</li> <li>- the need to manage stormwater onsite which impacts on the extent of land required; and</li> <li>- the scale of earthworks anticipated.</li> </ul> <p>Adverse effects have been appropriately managed through the site selection process, project design and mitigation measures.</p> <p>As outlined above KiwiRail has sought to avoid, or as appropriate remedy or mitigate, the potential for adverse effects, from incompatible new use and development occurring under, over or adjacent to regionally or nationally important network utilities during the site section process and the identification of the designation extent. The selection of Rural and NEI zoned land in this location has limited the potential for reverse sensitivity effects on the Hub itself from other infrastructure. As one of the first network utility corridors in the area, the rail line that the Hub must connect directly to has been crossed by other regionally or nationally important network utilities such as electricity and high pressure gas. KiwiRail will work in accordance with policies 2.3 and 2.4 with these utilities, building on its long history of working with these asset managers here in Palmerston North and nationally to ensure that effects from incompatible activities are avoided.</p> <p>As outlined above KiwiRail has acted in accordance with Policy 2.5 and notified owners or managers of network utilities of regional or national importance about the project.</p>
<p><b>Other Existing Designations</b></p>	<p>Figure 6 in Appendix A shows the designations currently shown in the district plan in the vicinity of the works. The only designation directly affected is that of the NIMT running along the eastern side of Railway Road. KiwiRail is the responsible Requiring Authority for the NIMT. As outlined in the AEE the NIMT will be moved towards the west in this location and it is expected that KiwiRail will alter the designation accordingly at the appropriate time</p>

**Q 173. Please provide an assessment of the potential for adverse effects on neighbouring properties and land use activities, the natural environment and the health and wellbeing of the City's residents from the use, storage and transportation of hazardous substances associated with the Regional Freight Hub (ref section 14.3, Objective 1 of the District Plan). Is KiwiRail satisfied these effects can be prevented or mitigated, as per Policy 1.1 of the Palmerston North City District Plan?**

PNCC DISTRICT PLAN – SECTION 14.3	PLANNER COMMENT
<p><b>Objective 1</b></p> <p>To prevent or mitigate adverse effects on property, the environment and the health of City residents associated with the manufacture, use, storage or transportation of hazardous substances within the City.</p> <p><b>Policy 1.1</b> To ensure that the design, management and location of hazardous facilities within the City are managed in order that the adverse effects on people, property and the environment associated with the manufacture, use, storage or transportation of hazardous substances are prevented or mitigated.</p>	<p>KiwiRail must store hazardous substances on its yards as part of its day-to-day operational requirements. This is generally in the form of diesel to fuel the diesel locomotives that move freight on the network (other than Electric Locomotives operated between Palmerston North and Hamilton). The volume stored and the location will be subject to assessment at the time of detailed design.</p> <p>In addition, hazardous substances are currently transported by rail through Palmerston North and to Palmerston North. To ensure their safe transport KiwiRail complies with the rules for loading and unloading these substances and the established requirements related to handling including their labelling as well as preventive measures to reduce the risk.</p> <p>As outlined in the Contaminated Land response KiwiRail observes the requirements specified in NZ's statutes and regulations that include the Hazardous Substances and New Organisms Act 1996 (HSNO) and the Health and Safety at Work Act 2015 (HSWA) and the Hazardous Substances Regulations. These acts cover the environment and the health and safety of people in the wider environment and the workplace from the adverse effects of hazardous substances. The detailed design of the Hub must comply with the relevant requirements.</p> <p>Moving the facility out of central Palmerston North will ensure that risks associated with the transport of</p>

PNCC DISTRICT PLAN – SECTION 14.3	PLANNER COMMENT
	hazardous substances within the more intensively developed City roads are reduced.

**Q 177. Please provide a specific assessment against each relevant objective and/or policy in the National Policy Statements (identifying these by reference to the specific provision).**

NATIONAL POLICY STATEMENT	PLANNER COMMENT
<p><b>National Policy Statement on Electricity Transmission 2008 (NPSET)</b></p> <p>5. <i>Objective</i></p> <p><i>To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:</i></p> <ul style="list-style-type: none"> <li>• <i>managing the adverse environmental effects of the network; and</i></li> <li>• <i>managing the adverse effects of other activities on the network.</i></li> </ul>	<p>As part of the site selection process, it was recognised given the extensive nature of the electricity transmission network around Palmerston North and in particular Bunnythorpe, that depending on the site selected there could be potential impacts from the Regional Freight Hub on the electricity transmission network and that there could be effects of the electricity transmission network on the operation of the Regional Freight Hub. The location of the electricity transmission network relative to site options was a factor considered in the Multi Criteria Assessment process and where effects could not be avoided, this was a factor which had a bearing on sites being eliminated through the process.</p>
<p><i>Managing the adverse effects of third parties on the transmission network</i></p> <p><b>POLICY 10</b></p> <p><i>In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.</i></p>	<p>The northern area of the designation extent includes land occupied by a pylon and there are transmission lines crossing this section of the designation. The area where the transmission lines and pylon are located includes the existing NIMT corridor, the area proposed to be occupied by the future perimeter road, and the northern noise mitigation structures and planting. In this area the electricity transmission network is elevated due to the land contour. Therefore, the operation, maintenance, upgrading, and development of the electricity transmission network will not be compromised by the Freight Hub construction or operational activities. On that basis, adverse effects on the electricity transmission network that would arise from the operation of the Freight Hub can be appropriately managed.</p>
<p><b>National Policy Statement for Freshwater Management 2020</b></p> <p><b>2.1 Objective</b></p>	<p>Development of the Regional Freight Hub will result in the culverting of some of the existing stream tributaries that run through the site.</p>

NATIONAL POLICY STATEMENT	PLANNER COMMENT
<p>(1) <i>The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:</i></p> <p>(a) <i>first, the health and well-being of water bodies and freshwater ecosystems</i></p> <p>(b) <i>second, the health needs of people (such as drinking water)</i></p> <p>(c) <i>third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.</i></p>	<p>These stream sections have however been assessed (Technical Report F) as having negligible to low ecological value, and the loss of the streams when considered within the context of the wider Mangaone Stream catchment is assessed as being negligible in terms of environmental effects. Fish passage within the culverted streams will be provided for. These streams are not relied upon by people for health needs such as provision of drinking water.</p> <p>In terms of the water bodies downstream of the site, the quality of stormwater to be discharged from the site will be treated as outlined in section 9.7.2.5 of the AEE and will not therefore compromise the health and well-being of these water bodies or freshwater ecosystems.</p> <p>Erosion and sediment controls will be utilised during earthworks to ensure nearby water bodies are not adversely affected by sedimentation (noting that the potential effect of sedimentation of these water bodies has been assessed as being very low – refer to Technical Report F).</p> <p>Development of the Regional Freight Hub will assist in the ability of people and communities to provide for their social, economic and cultural well-being through the economic benefits that the Freight Hub will provide. These include the investment associated with establishing the Freight Hub within the Manawatu Region, the employment opportunities that will be created, and the social and economic benefits that will result from the decommissioning and eventual redevelopment of the existing Freight Hub at Tremaine Avenue.</p>
<p><b>Relevant Policies</b></p>	
<p>Policy 1: Freshwater is managed in a way that gives effect to Te Mana o te Wai.</p>	<p>As set out in the NPS-FM, Te Mana o te Wai has a hierarchy of obligations which are in Objective 2.1 which is assessed above.</p> <p>The NPS-FM outlines that Te Mana o te Wai also encompasses six principles relating to the roles of tāngata whenua and other New Zealanders in the management of freshwater, and these principles inform the NPS and its implementation.</p>

NATIONAL POLICY STATEMENT	PLANNER COMMENT
	<p>Te Mana o te Wai is therefore embedded in Objective 2.1 and the policies which make up with NPS-FM. Development of the Regional Freight Hub is considered to give effect to Te Mana o te Wai as outlined above and in the assessment of the policies outlined below.</p> <p>All regional councils must engage with local communities and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region. While Horizons Regional Council is yet to determine this for the Manawatu, it is anticipated that the outcome of that determination will inform the regional consent applications.</p>
<p>Policy 2: Tangata whenua are actively involved in freshwater management (including decision making processes), and Māori freshwater values are identified and provided for.</p>	<p>KiwiRail is actively engaging with mana whenua throughout the development of the Regional Freight Hub. The proposed designation conditions require that KiwiRail prepare a Mana Whenua Engagement Framework. The objective of the Framework is to recognise and provide for mana whenua values, develop mechanisms to avoid or mitigate effects on mana whenua values and provide opportunities for expression of those values.</p> <p>Further engagement with mana whenua (and through this, the identification of Maori freshwater values) will be undertaken at the time the regional council resource consents are prepared for the project, which will include consents relating to the installation of culverts, stormwater discharge and earthworks.</p>
<p>Policy 3: Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.</p>	<p>As outlined above, the loss of the streams has been considered within the context of the Mangaone Stream catchment and effects on the downstream receiving environment have been considered and provided for. Additionally, the stormwater conveyance systems through the site will be designed to manage potential upstream flooding effects as outlined in section 9.7.2.1 of the AEE and new/upgraded culverts will be designed to accommodate fish passage.</p>
<p>Policy 4: Freshwater is managed as part of New Zealand's integrated response to climate change.</p>	<p>The Regional Freight Hub design has taken into account the potential effects of climate change in that calculated stormwater runoff rates take into account the effects of climate change.</p>

NATIONAL POLICY STATEMENT	PLANNER COMMENT
	Stormwater detention ponds and new and upgraded culverts will be designed accordingly.
<p>Policy 5: Freshwater is managed through a National Objectives Framework to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.</p>	<p>Any relevant regional plan provisions that give effect to the National Objectives Framework will be considered at the time the required regional resource consents are applied for.</p>
<p>Policy 6: There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.</p>	<p>No wetlands have been identified within the designation extent in the sites that have been able to be accessed. With respect to sites that have not been able to be accessed that may contain wetlands, it is considered there is sufficient space within the designation extent to be able to sufficiently and successfully apply the effects management hierarchy as outlined in clause 3.21.</p>
<p>Policy 7: The loss of river extent and values is avoided to the extent practicable.</p>	<p>The Freight Hub has been designed to minimise the loss of stream extent as far as practicable through site selection and design. However, it is not practicable to avoid loss of stream extent in its entirety, and the tributaries being culverted in part are considered to have low ecological value. It has been further identified that there may be scope to enhance the northern watercourse through the site through naturalisation and planting. This will be confirmed at the detailed design stage of the Project. No loss of stream value will result beyond what is identified elsewhere in the NPS-FM assessment and the AEE.</p>
<p>Policy 8: The significant values of outstanding water bodies are protected.</p>	<p>In relation to Policy 8, outstanding water body (as defined in the NPS) means <i>"a water body, or part of a water body, identified in a regional policy statement, a regional plan, or a water conservation order as having one or more outstanding values"</i>.</p> <p>Policy 8 presumes that the outstanding water bodies have been identified by the regional council. There are no outstanding water bodies directly affected by the Freight Hub.</p>

NATIONAL POLICY STATEMENT	PLANNER COMMENT
Policy 9: The habitats of indigenous freshwater species are protected.	The streams within the area to be designated have been assessed as having negligible to low quality habitat (Technical Report F). The Freight Hub will include suitably designed culverts which when installed correctly have the potential to improve conditions for fish passage as outlined in section 9.6.3 of the AEE.
Policy 12: The national target (as set out in Appendix 3) for water quality improvement is achieved.	Development of the Freight Hub will not affect the ability of the national target to be achieved as water quality will not be adversely affected for the reasons outlined here and within the AEE. In fact, as outlined in Attachment 2 Ecology the results of the Macroinvertebrate sampling undertaken in January 2021 indicate the watercourses are in poor quality and have probable severe pollution and any discharges will be subject to New Zealand industry standard and the One Plan - Schedule E: Surface Water Quality Targets requirements as a minimum.
<b><i>New Zealand Coastal Policy Statement 2010 (NZCPS)</i></b>	The AEE identifies that Foxton beach is 40km downstream of the Freight Hub via the Mangaone Stream and Manawatu river. Any effects on downstream coastal environments will be appropriately managed through the regional consent process (with erosion and sediment control measures for earthworks and treatment of stormwater)
<b><i>National Policy Statement on Urban Development 2020 (NPS-UD)</i></b>	
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	<p>As outlined at 10.1.4 of the AEE, the NPS-UD applies to decisions on designations. The NPS-UD is relevant as Palmerston North is listed as a Tier 2 urban environment and is subject to the requirements specified in the NPS-UD.</p> <p>Policy 1 of the NPS-UD outlines that a well-functioning urban environment includes urban environments that have or enable a variety of sites that are suitable for different business sectors in terms of location and site size and support reductions in greenhouse gas emissions.</p> <p>The Freight Hub will contribute to a well-functioning urban environment in Palmerston North City. It will support the development of the</p>

NATIONAL POLICY STATEMENT	PLANNER COMMENT
	<p>NEIZ through its provision of land for the movement of freight which is a vital aspect of contributing to the creation of jobs within the region thereby supporting the social and economic well-being of communities.</p> <p>In addition, establishment of the Freight Hub and realignment of the NIMT will result in a number of other changes to the transport network that will improve safety and efficiency of vehicle movements. The design and construction of a modern new freight facility will also support safer handling of freight.</p> <p>The mitigation proposed including noise, landscaping and stormwater treatment will assist in ensuring the health and safety of our communities now and into the future.</p>
<p>Objective 4: New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</p>	<p>While the NEIZ currently includes rural land uses, this will change over time through development of industrial activities in the future. As recognised in this objective, it is anticipated that urban environments will change in order to meet the needs of the community and that as more intensive urban development occurs, amenity values will also need to change.</p> <p>The development of the Freight Hub is responding to the needs of the people and the wider regional community in that it is providing for more transport / freight options to support future growth. The change to an industrial focus in this part of the City and the focus on freight distribution has been signalled by the City’s strategic plans, recent plan changes and by the inclusion of this industrial area in Palmerston North. It has been clear for some time that this will mean changes to the environment surrounding Bunnythorpe and amenity values.</p>
<p>Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).</p>	<p>Both the Council in making its recommendation and KiwiRail in making its decision must take into account the principles of the Treaty. The principles of the Treaty of Waitangi include the duty of the Crown and Māori to act reasonably and in good faith and the duty of the Crown to actively protect Māori interests and make informed decisions. KiwiRail has actively sought input from iwi in order to understand the cultural values of the site. Engagement with iwi is</p>

NATIONAL POLICY STATEMENT	PLANNER COMMENT
	<p>ongoing. The proposed designation conditions also provide a process for preparing a mana whenua engagement framework in collaboration with iwi, in order to properly understand and provide for mana whenua values through the construction and operation of the Freight Hub.</p>
<p>Objective 6: Local authority decisions on urban development that affect urban environments are:</p> <ol style="list-style-type: none"> <li>1. integrated with infrastructure planning and funding decisions; and</li> <li>2. strategic over the medium term and long term; and</li> <li>3. responsive, particularly in relation to proposals that would supply significant development capacity.</li> </ol>	<p>The Freight Hub is a long-term strategic project in that it has been recognised as necessary infrastructure to support the movement of freight within the region and beyond (refer to section 2 of the AEE).</p> <p>Integration with the wider transport network has also been considered in the concept design of the Freight Hub. KiwiRail is committed to working with Waka Kotahi and Palmerston North City Council to enable the Freight Hub to be integrated with other infrastructure planning and funding decisions. The proposed designation conditions include a Rooding Network Integration Plan which provides a mechanism for ongoing engagement between the parties to ensure that Freight Hub is integrated with the wider transport network.</p>
<p>Objective 8: New Zealand's urban environments:</p> <ol style="list-style-type: none"> <li>(a) support reductions in greenhouse gas emissions; and</li> <li>(b) are resilient to the current and future effects of climate change.</li> </ol>	<p>The Freight Hub will increase capacity of freight movement by rail across the country. This directly supports a transition to moving a greater proportion of freight by rail (and thereby lowering the emissions contributed by freight movement). This supports the reduction of greenhouse gas emissions not just for Palmerston North, but in urban environments throughout the country. On a local level, the industrial and freight distribution activities being located closer to the Freight Hub will result in reductions in greenhouse emissions from reduced truck movements in the local area.</p> <p>Given the Government's commitment to work to reduce greenhouse gas and harmful pollutant emissions from transport, it is also anticipated that engines and equipment used in the Hub will be electrified. Electrification of the network will further reduce emissions contributed by rail.</p> <p>Being a lower emissions alternative to movement of freight by road, investment in rail infrastructure is more resilient to the effects of climate change and any corresponding costs</p>

NATIONAL POLICY STATEMENT	PLANNER COMMENT
	<p>that climate change adds to freight movements. For example, as the cost of carbon emissions increases (either through the ETS or market forces), the use of rail will become increasingly more cost effective relative to the use of roads. Investment in rail is therefore less vulnerable to changes in the price of carbon.</p>
<p>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <p>...</p> <p>(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and ...</p> <p>support reductions in greenhouse gas emissions; and</p>	<p>As set out in the response to Q121 (Attachment 8A Economics to the full s 92 response) the location of the Freight Hub next to the NEIZ will likely result in the NEIZ sites being seen as suitable for businesses involved in freight distribution, manufacturing or supply chain who will rely on goods being provided or delivered in bulk. There is also likely to be a range of service businesses of varying sizes established to support these businesses from the provision of specialist support services (such as logistics) to the provision of businesses servicing the needs of those working in the area (such as cafes, childcare, and other personal services).</p> <p>As noted above the development of the Freight Hub will support result in reductions in greenhouse emissions.</p>
<p>Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</p> <ol style="list-style-type: none"> <li>the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement</li> <li>the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)</li> </ol>	<p>Palmerston North City is by its inclusion in Tier 2 of the NPS- UD a council with an urban environment. Even though some of the area around the proposed Freight Hub is zoned Rural, as described within the AEE, approximately one third of the site is already zoned for industrial development. The proposed Freight Hub will essentially extend an area already zoned for urban development further into the adjoining land. This is preferable to a standalone Freight Hub within the rural area. The Freight Hub has been designed to contribute to a well-functioning urban environment through its integration with the existing road network, noise mitigation and landscaping.</p>
<p>Policy 10: Tier 1, 2, and 3 local authorities:</p> <p>(a) that share jurisdiction over urban environments work together when implementing this National Policy Statement; and</p>	<p>This policy is relevant to the delivery of the Freight Hub as KiwiRail needs to engage with PNCC to deliver the roading network improvements and changes that are necessary to achieve integrated land use and infrastructure</p>

NATIONAL POLICY STATEMENT	PLANNER COMMENT
<p>(b) engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and</p> <p>(c) engage with the development sector to identify significant opportunities for urban development.</p>	<p>planning. KiwiRail will work with the council and the development sector to deliver the opportunities that the Freight Hub offers.</p>

**Q179. The findings of Technical Report I - Contaminated Land Assessment suggest that the above provisions are relevant. Please provide an assessment.**

PROVISIONS	COMMENTS
<p>Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) 2011</p>	<p>The purpose of the NES is to ensure that land affected by contaminants in soil is appropriately identified and assessed at the time of being developed and if necessary remediated, or the contaminants contained, to make the land safe for human use. The NES provides national planning controls, applicable standards for contaminants in soil and the national approach to investigation and reporting.</p> <p>The NES is relevant as there is a change in landuse proposed. There will be bulk earthworks and the PSI (Technical Report I) identified that two HAIL have occurred within the designation extent:</p> <ol style="list-style-type: none"> <li>1. sheep dips/spray races (HAIL A8) and</li> <li>2. burn pads (HAIL G5).</li> </ol> <p>As anticipated in the NES further investigations will need to be undertaken in the form of a detailed site investigation (DSI) with soil sampling prior to the project works commencing. This investigation will inform whether a Site Management Plan as set out in the NES (referred to as a CSMP in Technical Report I) will be required.</p> <p>The volume and area of soil being disturbed means that a resource consent under the regulations is expected to be required.</p>
<p><b>Horizons One Plan - RPS – section 3.4.5</b></p>	
<p>Policy 3-15: Management of priority contaminated land</p> <p>Where land use changes are likely to increase the risks to human health or the environment from priority contaminated land (as identified under Policy 3-14) the Regional Council and Territorial Authorities must ensure that:</p> <p>the landowner or land developer fully investigates the extent and degree of contamination prior to the</p>	<p>The KiwiRail site potentially contains contaminated land in the form of likely HAIL activities associated with farming carried out on the land. Site investigations will be required to be undertaken to verify the presence of contamination.</p> <p>These activities present a potential risk to the health of workers during the construction phase of the Freight Hub. This risk will be managed through the preparation of DSI and</p>

PROVISIONS	COMMENTS
<p>granting of consent allowing development (assistance with investigations may be provided by the Regional Council in some cases), land is made suitable for its intended use through an appropriate level of remediation or management (including engineering) controls, and land remains suitable for its intended use through appropriate monitoring of residual contaminant levels and associated risks and through the use of management controls on the activities undertaken on the land.</p>	<p>a CSMP (if required to outline remediation and management measures) as well as any resource consent required to be obtained under the NES-CS.</p>
<b>PNCC District Plan – Section 14</b>	
<p>Objective 1</p> <p>To prevent or mitigate adverse effects on property, the environment and the health of City residents associated with the manufacture, use, storage or transportation of hazardous substances within the City.</p> <p>Policy 1.1 To ensure that the design, management and location of hazardous facilities within the City are managed in order that the adverse effects on people, property and the environment associated with the manufacture, use, storage or transportation of hazardous substances are prevented or mitigated.</p>	<p>Please refer to the response for question 173</p>
<p>Policy 1.5 To avoid duplication of the regulation of activities controlled by the Hazardous Substances and New Organisms Act 1996 and other workplace safety law by:</p> <p>(a) Generally allowing activities that meet the relevant requirements of the HSNO Act and other workplace safety law; and</p>	<p>KiwiRail is obliged to observe the requirements specified in NZ's statutes and regulations that include the Hazardous Substances and New Organisms Act 1996 (HSNO) and the Health and Safety at Work Act 2015 (HSWA) and the Hazardous Substances Regulations.</p>

**Q 180. Please identify the Schedule Values for the water management zone and relevant sub zone, and assess the proposal in relation to these values.**

HORIZONS ONE PLAN - RPS	COMMENT
<p>Objective 5-1: Water management Values</p> <p>Surface water bodies and their beds are managed in a manner which safeguards their life supporting capacity and recognises and provides for the Values in Schedule B1.</p>	<p>The relevant Schedule B management values are identified in Table 1 below. It was determined that the site directly affects one of the "rivers" listed under Upper Mangaone Stream (Mana_11d), as the river with locality description "from confluence with the</p>

HORIZONS ONE PLAN - RPS	COMMENT
	<p>Mangaone Stream at approx. NZMG260 T24 325 969 runs through the centre of the site. [The NZMG260 Map grid coordinate references were converted and applied to the NZ Topo 50 map]</p> <p>The water management values that apply to the Upper Mangaone and its tributaries (Mana_11d) are relevant as the Freight Hub will either directly affect the tributaries or water from the project will discharge to tributaries that drain to the Mangaone Stream. While the values will be considered in more detail during the processing of future regional consents, by making provision for sufficient land within the Designation Extent for stormwater treatment to ensure that there are systems in place to appropriately manage discharges. The NOR also allows for flood control and drainage values to be addressed as risks associated with flooding upstream of the site and the release of stormwater in rain events has been considered.</p>
<p>Policy 5-1: Water Management Zones and Values  For the purposes of managing water quality, water quantity, and activities in the beds of rivers and lakes, the catchments in the Region have been divided into Water Management Zones and Water Management Sub-zones in Schedule A.2  Groundwater has been divided into Groundwater Management Zones in Schedule D.3  The rivers and lakes and their beds must be managed in a manner which safeguards their life supporting capacity and recognises and provides for the Schedule B Values when decisions are made on avoiding, remedying or mitigating the adverse effects of activities or in relation to any other function under the Resource Management Act 1991 exercised by the Regional Council or Territorial Authorities. The individual Values and their associated management objectives are set out in the Schedule B Surface Water Management Values Key and repeated in Table 5.2.</p>	<p>As set out in the Stormwater and Flooding assessment (Technical Report G) supporting the NOR provision has been made in the Designation Extent for the land required by KiwiRail to both manage water quality and water quantity associated with, the discharge of stormwater from the Freight Hub. The work done has indicated that the effects of the development and operation of the Freight Hub will be managed in a manner that is consistent with this policy.</p>

**Table 1 Schedule B values**

The following are the relevant Schedule Values from Schedule B for the water management zone and Upper Mangaone sub zone and its tributaries that are either directly affected by the project or where the water from the project will discharge to.

	Management Objective	Relevant to Upper Mangaone (Mana 11d)	Comment
Life-supporting Capacity	The water body and its bed support healthy aquatic life / ecosystems	Lowland Mixed	As noted in the ecology assessment the waterbodies within the site are polluted. It is concluded that it is likely that the waterbodies are not themselves in a good state for supporting healthy aquatic life / ecosystems
Aesthetics	The aesthetic values of the water body and its bed are maintained or enhanced		the waterbodies are in a heavily modified environment with no vegetation, so the existing aesthetic values are low
Contact Recreation	The water body and its bed are suitable for contact recreation		Testing has not been undertaken in terms of contact recreation
Mauri	The mauri of the water body and its bed is maintained or enhanced		With respect to the current level of pollution and the absence of planting it is highly likely that the works as proposed could

			enhance the mauri of streams
Industrial Abstraction IA2	The water is suitable as a water source for industrial abstraction or use, including for hydroelectricity generation		No water is being abstracted. Stormwater will be discharged from the site and this discharge will need to meet the appropriate standards for use by others downstream
Irrigation;	The water is suitable as a water source for irrigation		Future discharges will need to meet the appropriate standards for use by others downstream
Stockwater	The water is suitable as a supply of drinking water for livestock	Not identified as relevant in Schedule to this sub zone	
Existing Infrastructure	The integrity of existing infrastructure is not compromised		There is no existing infrastructure on these streams other than road and rail culverts and these will be upgraded where required
Capacity to Assimilate Pollution	The capacity of a water body and its bed to assimilate pollution is not exceeded		As noted in the ecology response the streams are already polluted. Future discharges will need to meet the appropriate standards to avoid [pollution
Amenity;	The amenity values of the water body and its bed (and its margins where in public ownership) are maintained or enhanced		No margins are in public ownership in this location. The values will be enhanced with planting where appropriate

<p>Flood Control and Drainage</p>	<p>The integrity of existing flood and river bank erosion protection structures and existing drainage structures is not compromised and the risks associated with flooding and erosion are managed sustainably</p>		<p>No existing flood and river bank erosion protection structures will be affected, The designation has been sized to ensure that risks associated with flooding are managed. All banks will be stabilised and planted to minimise potential for erosion</p>
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**Q181. Please provide an assessment against Policy 9-3 and Policy 9-5 Climate change.**

<b>HORIZONS ONE PLAN - RPS</b>	<b>COMMENTS</b>
<p>Policy 9-3: New critical infrastructure</p> <p>The placement of new critical infrastructure in an area likely to be inundated by a 0.5% AEP (1 in 200 year) flood event 2 (including floodways mapped in Schedule J), or in an area likely to be adversely affected by another type of natural hazard, must be avoided, unless there is satisfactory evidence to show that the critical infrastructure:</p> <ul style="list-style-type: none"> <li>(a) will not be adversely affected by floodwaters or another type of natural hazard,</li> <li>(b) will not cause any adverse effects on the environment in the event of a flood or another type of natural hazard,</li> <li>(c) is unlikely to cause a significant increase in the scale or intensity of natural hazard events, and</li> <li>(d) cannot reasonably be located in an alternative location.</li> </ul>	<p>The Freight Hub is part of the rail network and falls within the definition of critical infrastructure. Parts of the Freight Hub will be located on land subject to the 0.5% AEP flood event/ “1 in 200 year” flood (refer to Technical Report G attached to the AEE). Extensive filling will be required to create a flat site suitable for use as a Freight Hub which will bring the site above the flood level, therefore it will not be adversely affected by floodwaters. Upstream and downstream potential flooding effects will be managed as described in section 9.7 of the AEE.</p>
<p>Policy 9-5: Climate change</p> <p>The Regional Council and Territorial Authorities must take a precautionary approach when assessing the effects of climate change and sea level rise on the scale and frequency of natural hazards with regard to decisions on:</p> <ul style="list-style-type: none"> <li>(a) stormwater discharges and effluent disposal,</li> </ul> <p>[...]</p>	<p>The stormwater design for the site including the upgrading of the existing culverts under the NIMT and Railway Road will be in accordance with current design standards (such as Auckland Council GD001, PNCC Engineering Standards, Palmerston North District Plan, Horizons One Plan, NZ Fish Passage Guidelines, Auckland Council GD005). These standards include consideration of the effects of climate change on stormwater runoff rates.</p>

**Q182. Please clarify what KiwiRail considers to be a permitted baseline (if any) in respect of the areas of NEIZ land within the Regional Freight Hub.**

The Environment Court has confirmed that the permitted baseline may be applied when the Council is considering a notice of requirement under section 171 of the RMA.

Approximately one third of the designation extent is located on land in the NEIZ as shown in Figure 1 below.



*Figure 1 Outline of hub and designation (with underlying NEIZ shown at the bottom of the figure)*

The land uses permitted under the NEIZ under R12A.4.1 include:

- Industrial Activities
- Warehousing, storage and depots
- Roads (including their construction), walkways, railway access, and cycle ways
- Establishment and maintenance of planting areas
- Water Attenuation Activities within Water Course Reserve Areas

Therefore, it is considered that the type of activity particularly in relation to Industrial Activities; Warehousing, storage and depots; Roads (including their construction), and railway access, is envisaged by the zone and the nature of the effects of those activities with the introduction of heavy vehicles and associated traffic movements are anticipated on Roberts Line in particular.

Figure 1 The indicative layout shown in Figure 1 shows that almost half of the freight forwarding facilities and the container terminal are in the NEIZ. The permitted height in the NEIZ is 9m. As set out in section 3.5 of Technical Report A (Design, Construction and Operation), all buildings and most fixed structures, apart from lighting poles, are expected to be no more than 9m. This is in keeping with the height of buildings anticipated in the NEIZ. The buildings are to be set back from the external roads and the proposed landscaping is expected to comply with the NEIZ landscape amenity rule. Compliance with the parking, loading and access rules is anticipated, along with lighting (Rule R11.6.1.1(a)(vi)). Outdoor storage areas will be screened as anticipated and the roofs of buildings could be required to have a matt finish as required in performance standard (n).

Rules that may not be complied with are:

- The requirement that noise complies with R12A.10.1 Noise.
- The size of buildings (limited to 500m<sup>2</sup>)
- That any side of a building is no more than 50m in length

On the basis of the above, the following effects should be disregarded:

- The effects of 13000m<sup>2</sup> of building platform. (This area has been determined as the NEIZ area is roughly 530,000m<sup>2</sup> and under the Subdivision Rules in section 7 of the District Plan, the minimum area of a lot in the NEIZ is 2 ha and provided it complies with the performance standards, subdivision is a controlled activity. This means that there is the theoretical potential for 26 lots to be created within the area of the NEIZ in the designation and with a 500m<sup>2</sup> building on each; the potential for 13,000m<sup>2</sup> of building).
- The effects of the associated traffic generated by the permitted 13000m<sup>2</sup> floor area.
- The visual effects of the permitted 13000m<sup>2</sup> floor area at 9m tall.

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**17.3.1 National Policy Statement for Freshwater Management 2020 (NPS FM)**

**Q 183. Please provide an assessment of the proposal in relation to the NPS FM. This assessment may be informed by the response to the questions in section 5.**

Please refer to the response for question 177 above

**17.3.2 Government Policy Statement on Land Transport (GPS LT)**

**Q184. Please provide an assessment as to how the Regional Freight Hub proposals align with the four 'strategic priorities' in the Government Policy Statement on Land Transport.**

The GPS 2021 has four strategic priorities. These are intended to guide land transport investment. The planning instrument also notes that the four strategic priorities overlap (ie investments in the rail system will lead to stronger interregional connections while also making freight movements safer). These priorities provide a framework for the type of investment the Government wants to see, they are not prescriptive, and all four priorities do not necessarily need to be met.

1. Safety – developing a transport system where no-one is killed or seriously injured

Reducing the volume of road traffic by supporting the movement of freight by rail instead of by road will improve road safety. While there will be an increase in freight movements by road around the Regional Freight Hub it is understood that the roads will be upgraded to accommodate the safe movement of these vehicles before the Regional Freight Hub is operational. Other parts of the local and

national road network are being upgraded but the result of reducing the number of container and freight movements on the road will result in safety improvements as the potential for conflict with trucks will be reduced. In addition, the formation of the Freight Hub and realignment of the NIMT will result in removal of level crossings, which will also assist in making the local transport system safer. The design of the Regional Freight Hub and the introduction of any new technology will be delivered in line with KiwiRail's vision of Zero Harm with the goal to operate a workplace without exposing an individual to injury through the implementation of safe work systems. Delivering with Zero Harm in mind will help make the handling of freight and operation of the freight yard safer.

2. Better Travel Options - Providing people with better transport options to access social and economic opportunities

The eventual decommissioning of the Existing Freight Yard at Tremaine Avenue may result in better connectivity, as the removal of the large freight operations and the associated truck movements will result in potentially less congested transport corridors within the area surrounding the Existing Freight yard. The new Perimeter Road, while primarily providing access to the Freight Hub, will be formed to new road standards, which will provide a safer and more reliable road connection from Bunnythorpe as well as providing opportunities for walking and cycling.

3. Improving Freight Connections- Improving Freight Connections for economic development

The Regional Freight Hub will provide greater efficiencies in terms of moving freight both due to its location in the NEIZ and proximity to the airport. There is also potential for improved freight connections once the improvements signalled for the wider transport network are in place. This will result in improved freight connections and economic development benefits outlined in Technical Assessment K lodged with the NOR. The GPS 2021 seeks to increase movements of freight by rail to improve environmental sustainability and travel safety. This is to be done by investing in rail infrastructure and network optimisation. This aspect of the GPS 2021 is discussed further in section 2.4.2 of the AEE and in the s92 responses to question 121(x) set out in [ Frasers doc] where it is noted that the project may have important wider benefits by creating a blueprint for future developments and hence improving the economic efficiency with which the rail network is developed over time.

4. Climate change - Developing a low carbon transport system that supports emissions reductions while improving safety and inclusive access.

As noted in section 2.2 of the AEE moving more freight by rail will result in a reduction in carbon emissions, noting that transporting a tonne of freight by rail generates 66% less emissions than road transport (Draft New Zealand Rail Plan, KiwiRail Ministry of Transport, 2019). In the GPS 2018, the New Zealand Government committed to working to reduce greenhouse gas and harmful pollutant emissions from transport and improve public health outcomes by substantially increasing the use of lower emission modes, such as supporting rail. The expectation is that a fully functioning rail freight system that would include the proposed Regional Freight Hub given Palmerston North's critical position in the network would generate an overall reduction in transport emissions due to the better environmental sustainability outcomes associated with reduced carbon emissions from trains instead of vehicle movements. The Regional Freight Hub will provide greater efficiencies that will make rail more attractive relative to

movement of freight by road and result in a reduction in volumes moved between Palmerston North and other destinations by road.

The decision to fund the refurbishment of 15 locomotives to enable electric haulage of freight trains on the 410 km NIMT between Palmerston North and Hamilton in tandem with locating the Freight Hub on the NIMT, north of Palmerston North is key to ensuring the reduction in greenhouse gas emissions and associated environmental benefits related to climate change. In the long term there is also the potential for further electrification of the rail network which will further contribute to emissions reductions in combination with a modal shift from road to rail.

**Q 185. Section 10.4.3 of the AEE notes that the Government Policy Statement on Land Transport 2021 implements the findings of the Future of Rail Review. Please provide further detail as to how the proposal will assist in delivering the draft New Zealand Rail Plan.**

The draft New Zealand Rail Plan 2019 (Rail Plan) highlights a need to invest in the national rail network to maintain and grow rail freight, noting the significant investment that is required throughout the network. Opportunities for investment in rail to support an increased role for the transport of freight by rail outlined in the Rail Plan include improved logistics hubs. As set out in the Rail Plan, the Provincial Growth Fund has enabled particular consideration of rail projects that would benefit regions through job creation, delivery of goods and the movement of freight off regional roads. An intermodal freight hub in Palmerston North to help grow the role of Palmerston North as a critical freight distribution centre for the lower north island is listed in the Rail Plan as an investment priority for the region. The proposal is to designate the land required for the development of this intermodal freight hub.

### **17.3.3 Other Council strategies and strategic planning documents**

**Q 186. The Council considers the following documents are important 'other matters' that it is required to have particular regard to in accordance with s171(1)(d). Please provide an assessment of how the project aligns with the strategic priorities in the following documents:**

**(i) Regional Land Transport Plan (2015-2025) 2018 Review;**

The Regional Land Transport Plan (2015-2025) 2018 Review (RLTS) identifies increased pressure on transport links due to forecasted population growth. It recognizes the Palmerston North - Manawātū sub-area as the hub of the growing freight distribution industry because of its location in the central part of the lower North Island, connecting to the surrounding regions of Taranaki, Hawkes Bay, Waikato and Wellington via the State Highway, rail and air networks. The RLTS highlights that the Horizons Region has long advocated for better utilisation of existing rail infrastructure for the movement of freight to and from the region. Network efficiency is identified as a key issue for the region (Issue 2), noting there is an under-utilised rail network that needs to be better integrated and to cater better for freight. The plan recognizes that increased use of the rail network for freight will increase the resilience of the regional land transport network and would have positive road safety outcomes due to reduced conflicts between heavy vehicles, private vehicles and cyclists (section 3.2.5). The objectives of the RLTS are consistent with the proposal for a new freight hub. The five objectives are outlined below:

1. An optimised road, rail and public transport network that provides efficient, reliable access and movement for people and freight to and from key destinations, within and outside the region.
2. Maximise the strategic advantage of central New Zealand through efficient and well serviced hubbing and freight distribution activities, including better utilisation of rail corridors.
3. A safe land transport system increasingly free of death and serious injury.

4. A reliable multimodal transport system with less modal conflict, including walking and cycling, that mitigates potential environmental effects and improves environmental outcomes.
5. A resilient transport network with secure inter and intra-regional routes, that can perform following an unplanned event.

**(ii) Accelerate25 Regional Economic Development Strategy; Manawatū-Whanganui Growth Study Economic Action Plan 2016**

'Distribution and Transport' is identified within the Action Plan as a key enabler to unlock potential economic growth. The Action Plan also recognizes the importance of Palmerston North as a key multi-modal intersection at the centre of rail and road networks which go north, south, east and west and the importance of streamlined and efficient movement. It identifies that the region needs to have capacity to efficiently collect, package and redistribute product and in so doing, reduce costs and increase the speed associated with getting products to market. The proposed Freight Hub aligns with Accelerate25 in that it will provide for improvements in the efficiency of freight distribution at this key multi-modal point and support the development of the efficient and well-serviced hubbing that the action plan envisages.

**(iii) PNCC 10 Year Plan;**

The PNCC 10 Year Plan states that the NEIZ and Longburn are well located to leverage off the presence of rail within the city, but a plan is needed to make sure rail forms a key part of future freight, distribution and logistics activities in these locations. The plan therefore recognizes the importance of rail in the distribution of freight and identifies that major infrastructure projects are a key enabler for growth. The proposed Freight Hub in the core component in ensuring the efficient utilisation of rail within the region. KiwiRail recognises the need to integrate the proposed Freight Hub with the surrounding road network including the future ring road proposed by Waka Kotahi. The proposed conditions, which require consultation with PNCC and Waka Kotahi and the preparation of a Roding Network Integration Plan, demonstrate KiwiRail's commitment to working with these road controlling authorities to ensure that the Freight Hub appropriately integrates with the wider transport network.

**(iv) Economic Development Strategy 2018;**

The proposed Freight Hub aligns with a number of Goals and Priorities of the Palmerston North Economic Development Strategy 2018 which are outlined below:

- Goal 1: an innovative and growing city

We will drive entrepreneurship and innovation by providing the support, infrastructure, opportunities and conditions to enable traditional sectors to diversify and expand, and new industries and new economies to grow to create the employment opportunities that sustain and expand our city's future. Palmerston North will stand out by transforming its economy to a low carbon economy, backed up by an action plan.

Priority 1: Create and enable opportunities for employment and growth.

- o By supporting local businesses and industries to grow and develop, Council will encourage new opportunities to attract investment to Palmerston North and the Manawatu region.
- o The development of the Freight Hub will generate future long-term employment opportunities in the logistics sector together with more temporary construction and land

development opportunities relating to construction activity. As noted in the response to Q 121(v). in Attachment 8 Economics, the wider benefits in terms of construction alone are estimated to be generate nearly \$1 billion of GDP for the north island (including \$680 million of flow-on effects) and create employment for nearly 9,200 FTE-years with the potential that this employment could boost household incomes by around \$480 million over the construction period.

Priority 2: Provide infrastructure to enable growth and a transport system that links people and communities.

- This includes focusing on distribution and transport connections, to make it easier to get business done.
- Improved connectivity for freight will benefit the region, by improving economic viability for businesses in the city and wider region.

The Freight Hub will enable improved connectivity and efficiency for the movement of freight which is likely to be beneficial for businesses in the city and wider region.'

Priority 3: diversify the economy to reduce reliance on traditional industries

- Council has identified logistics as one of the six priority sectors that will help determine the city's future economic wellbeing.
- Council's goal is to support these sectors and help them grow.

This plan demonstrates a strong emphasis on infrastructure and innovative industries for Palmerston North. The Council has identified logistics as one of the six priority sectors that will determine Palmerston's future economic wellbeing. The Council agrees to support investment in this area. The Freight Hub introduces an innovative logistics model into the region and supports the overarching goal of expansion (ie increased employment opportunities and better connectivity with the broader transport network). This should support both existing and growing industries in the area.

#### **(v) City Development Strategy 2018**

The City Development Strategy identifies strategic goals for the city's development between 2018 and 2028. The preface of the plan is that having a ready supply of land with infrastructure to support the city's growth will ensure Council can harness new development opportunities and increase Palmerston North's competitiveness. The city must build on its historical strengths, including its transport network, supply of productive land and accessible freight and logistics hubs.

Below are key aspects of the Strategy that are relevant to the Freight Hub (outlined in Priority 1: Create and enable opportunities for employment and growth):

- The formal planning framework for future industrial development is well settled. Industrial land has been made available to the north-east of the city and at Longburn. The north-east is earmarked for large-format freight, distribution and logistics activities, while Longburn is best suited to wet or processing industries. Both locations are well placed for the new regional ring road.
- The Council will undertake a collaborative planning exercise to direct future investment in rail at the north-east and Longburn. Integrating rail to form a significant intermodal freight and distribution hub is a major strategic issue. Rail access at

Longburn is limited to sidings only and rail is unavailable at the north-east.

This plan gives a clear directive for the Council to support infrastructure development. The plan notes that Integrating rail to form a significant intermodal freight and distribution hub is a major strategic issue (in that current rail access is limited and existing infrastructure is privately owned) The road access and network upgrades anticipated as part of the development of the Freight Hub should assist in improving access to rail.

**(vi) Strategic Transport Plan 2018/2021**

The Active and Public Transport Plan states that Palmerston North wants “Safe, resilient and reliable travel routes, conditions and interconnected intermodal transportation provide prioritise (sic) for active and public transport users”.

The relocation of the existing freight distribution centre out of the city will reduce truck movements within the city, thereby creating safer travel routes for vehicles, cyclists and pedestrians.

- The *purpose* of the Strategic Transport Plan is to provide infrastructure to enable growth and a transport system that links people and opportunities, and provides amenity, safety, interconnectivity, accessibility, resilience and reliability.
- Relevant strategic goals of the Council that development of the Freight Hub aligns with (or has potential to align with as details are finalised) are:
  - o A transport system that provides a choice of intermodal transport connections and integration of modes of transport that safely and efficiently gets freight, services, and people where they need to be.
  - o Resilient and reliable interconnected intermodal transportation of goods, services, and people.
  - o Reliable road i.e. rail links for industry.
  - o Resilient rail and road infrastructure and interconnectivity form a key part of freight, distribution and logistics activities in the north-east industrial zone and Longburn.
  - o Heavy vehicle and through traffic and directed to use the regional/inner ring roads.
  - o There are good relationships between the Council and KiwiRail (along with Palmerston Airport and Waka Kotahi).

The Freight Hub goes directly to the purpose of this planning document, which in short, seeks to provide transport infrastructure. Logistics has been identified as a key infrastructure target for the region. The Freight Hub is intended to be both "resilient and reliable" infrastructure in that is intended to support growth of freight movement over the next 30 years, and to support a modal shift from road to rail movement of freight, to contribute to emissions reductions. On that basis it is a significant investment in supporting New Zealand's commitments in emissions reductions.

## *Appendix A to S92 Planning Response*

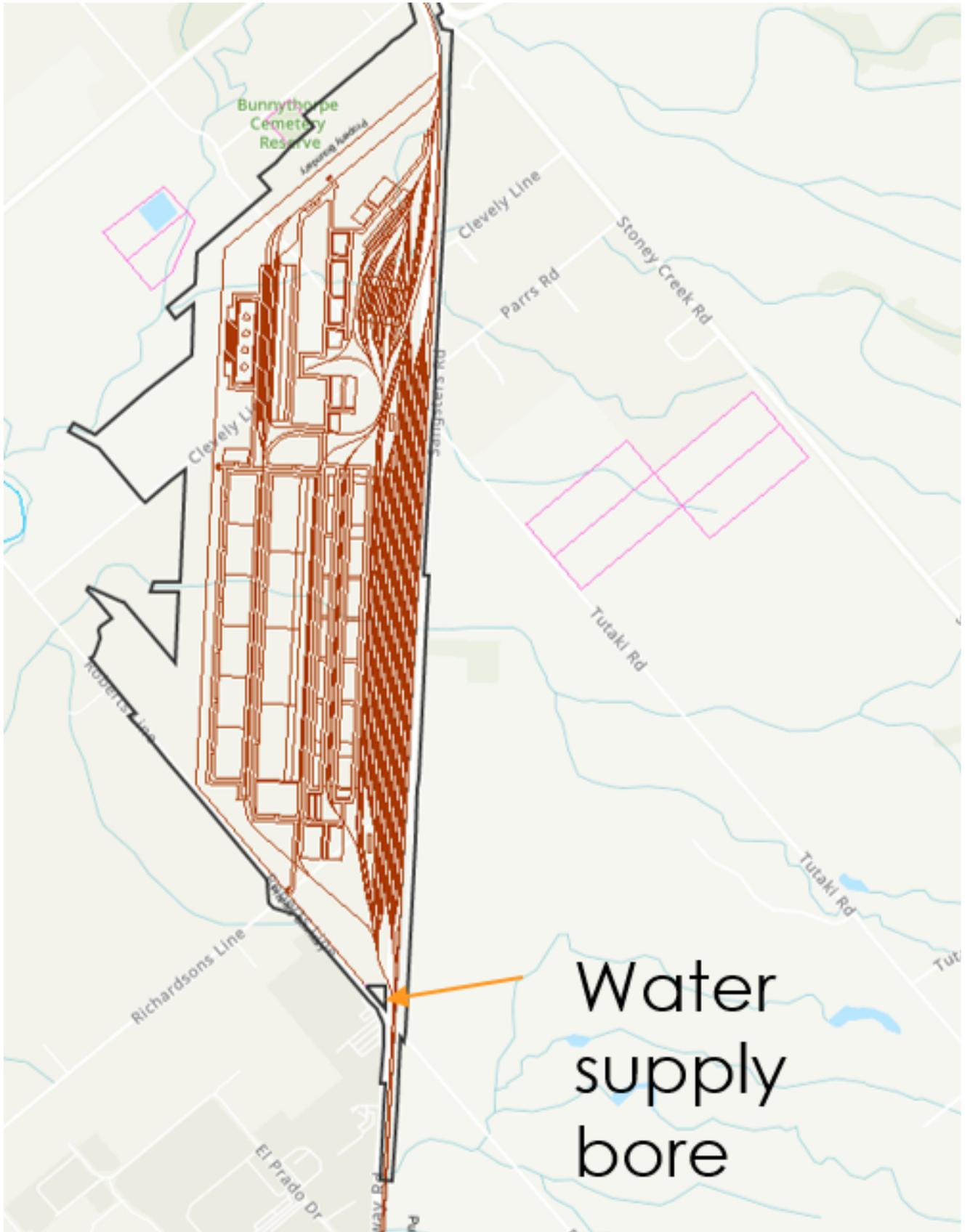


Figure 2 Water supply bore

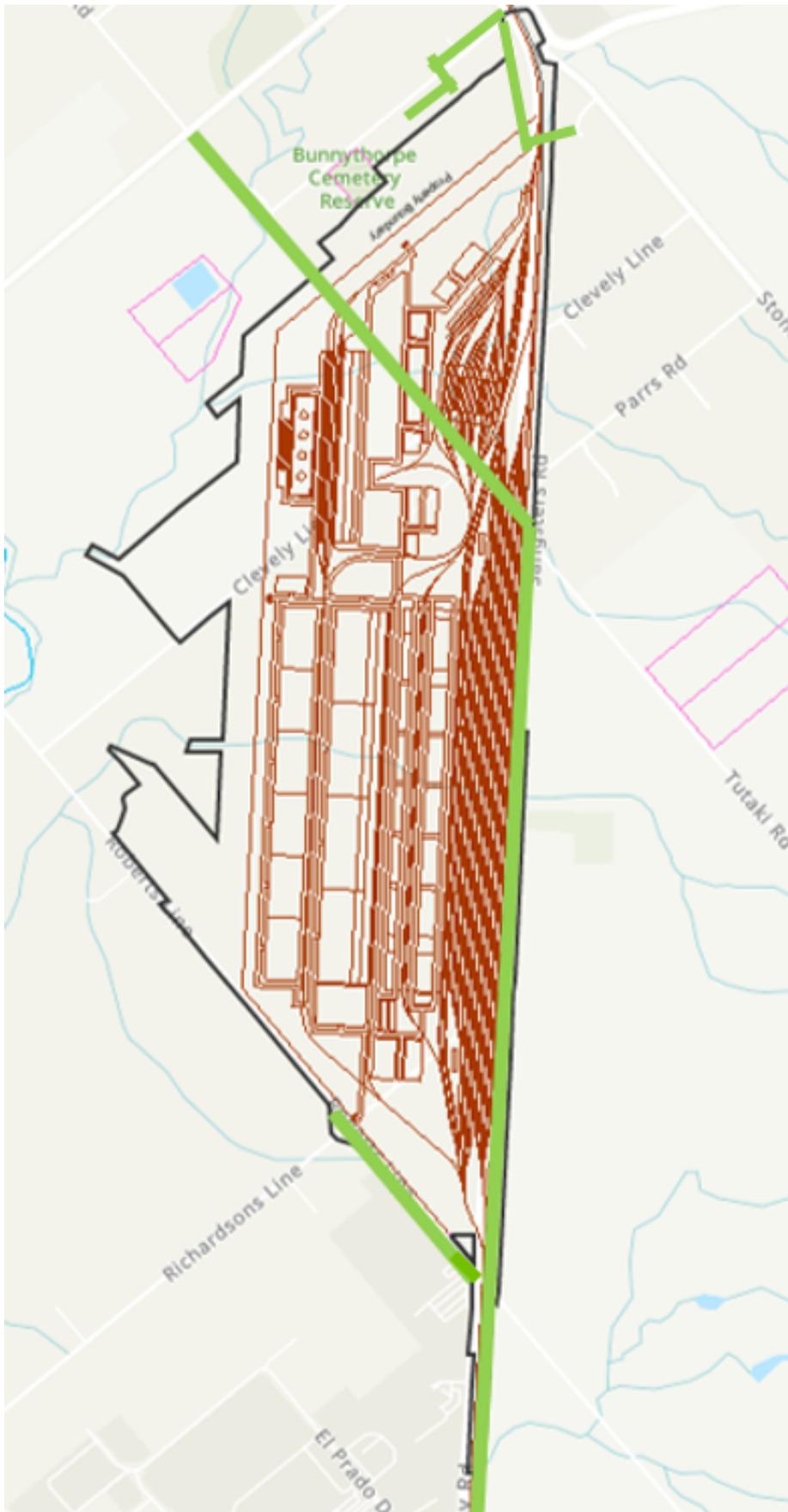


Figure 2 Wastewater Sewers(green)

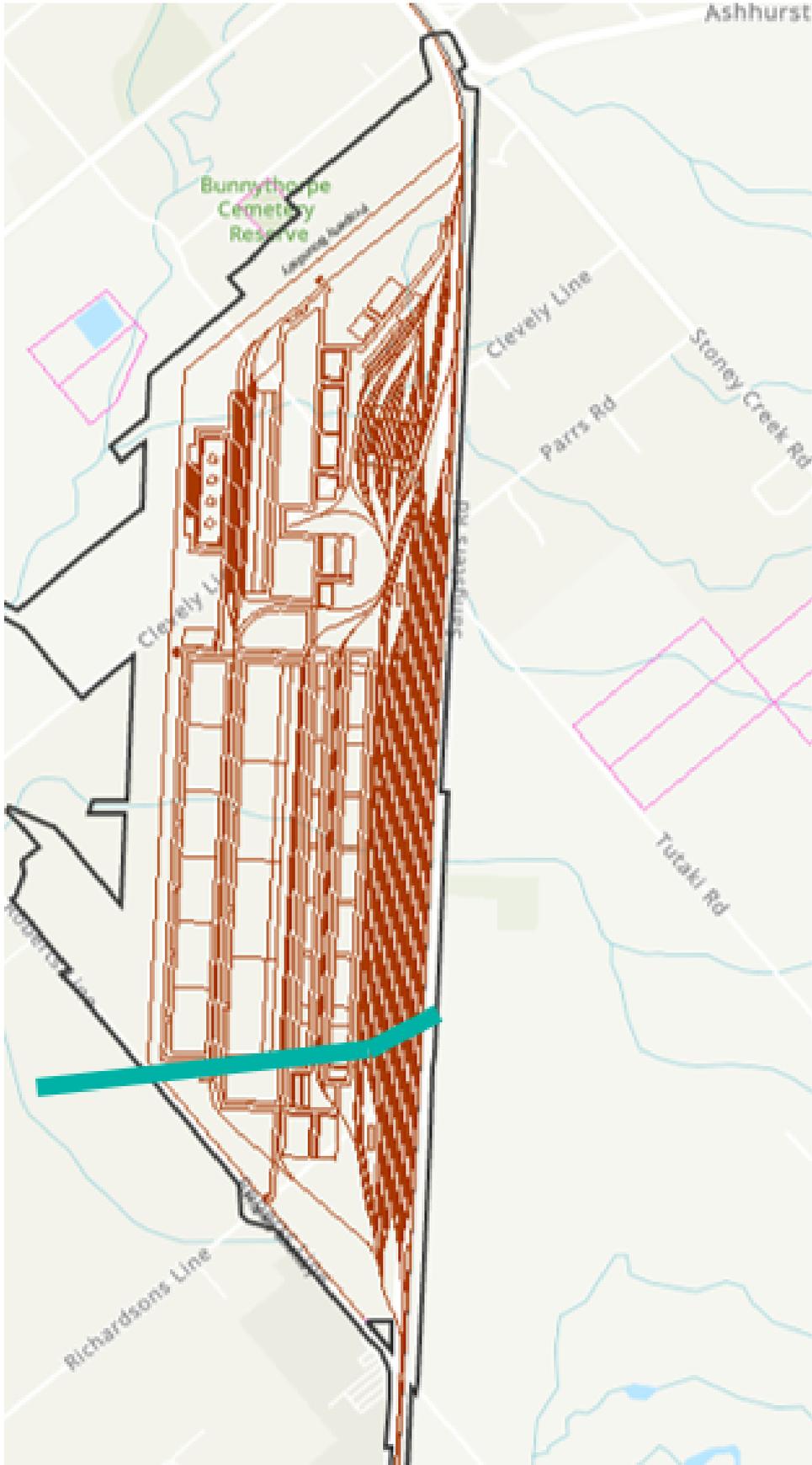


Figure 3 First Gas High Pressure Pipeline (teal)

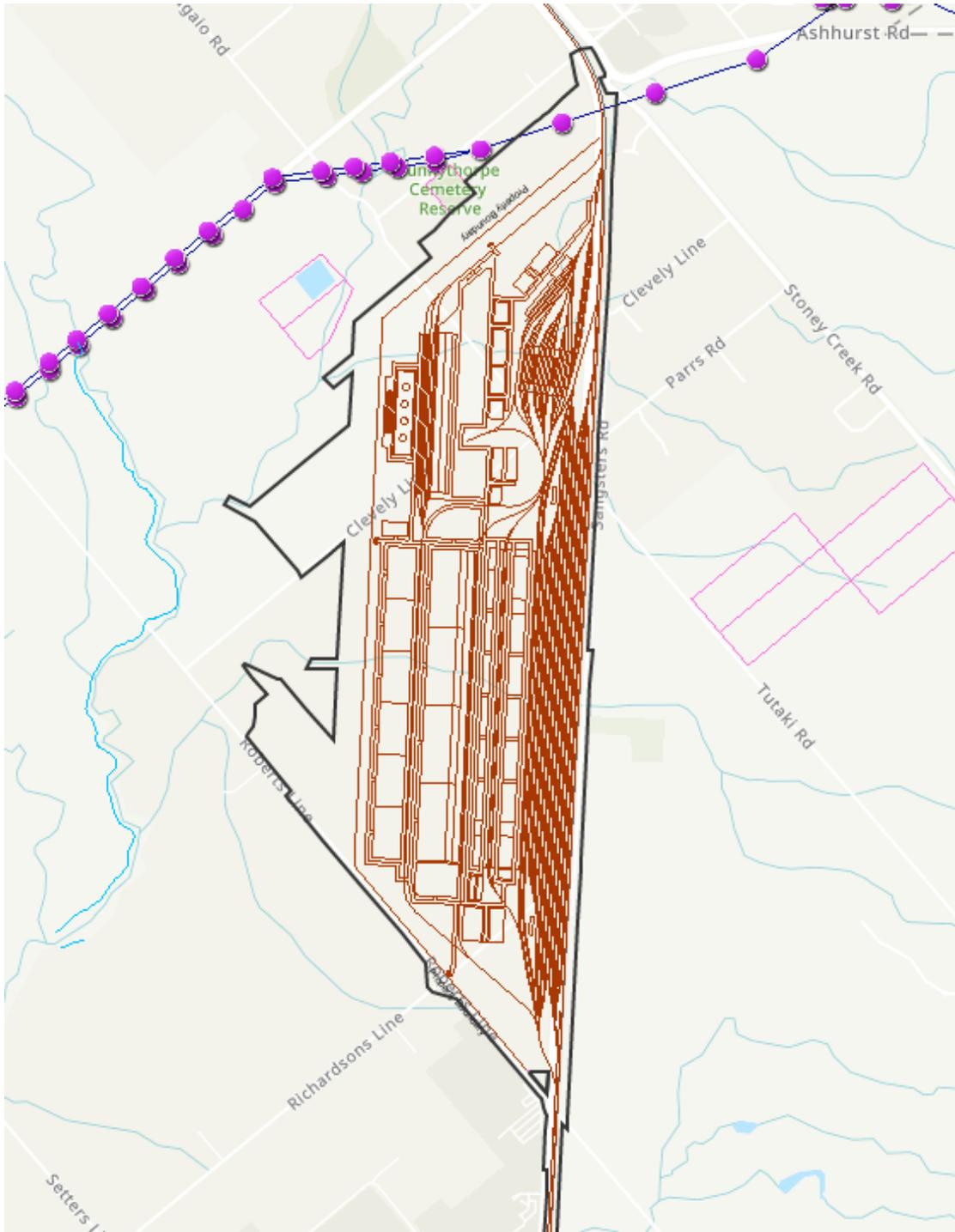


Figure 4 Transpower Transmission Lines and pylons (pink)

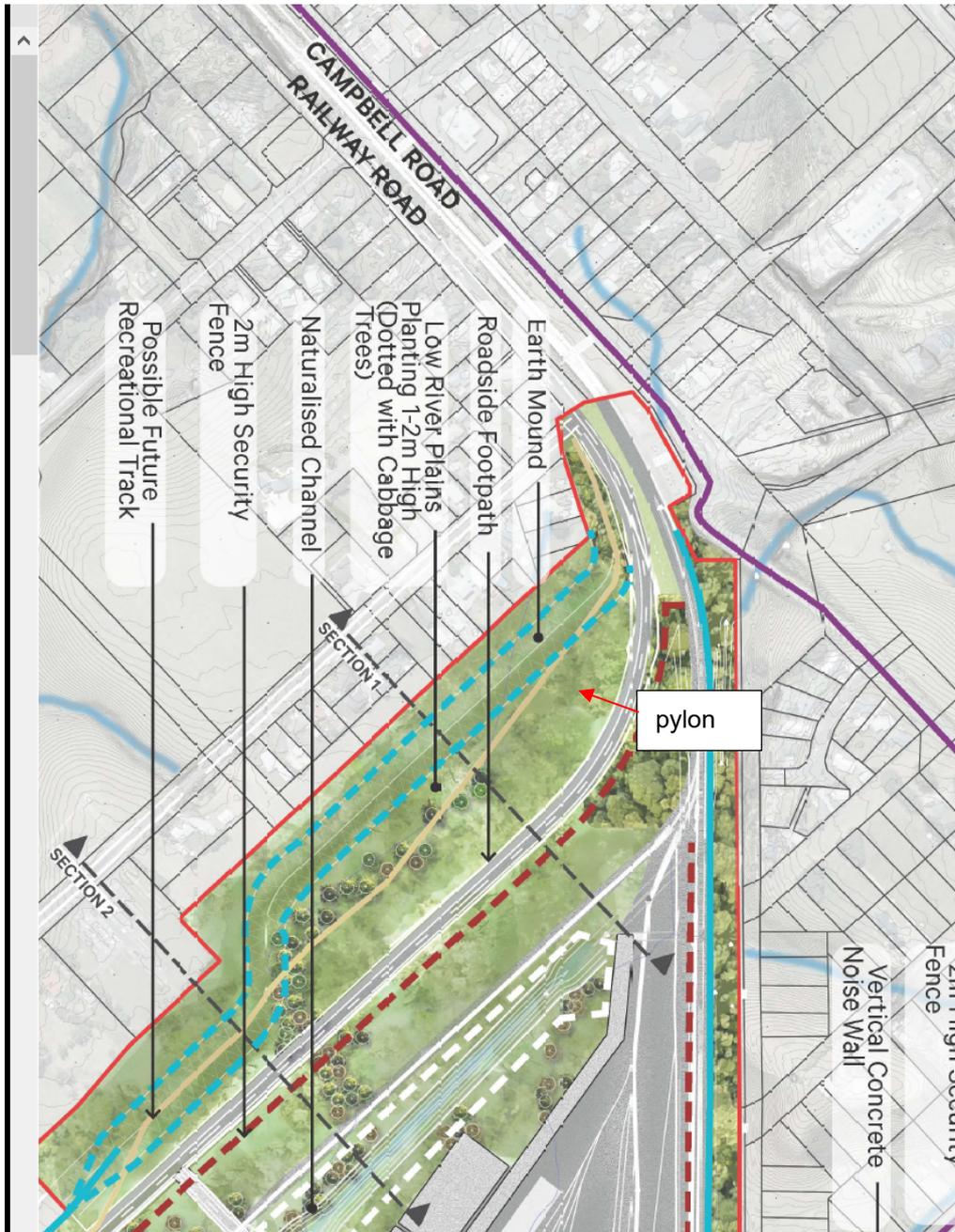


Figure 5 Extract from Appendix C Indicative Landscape Plan

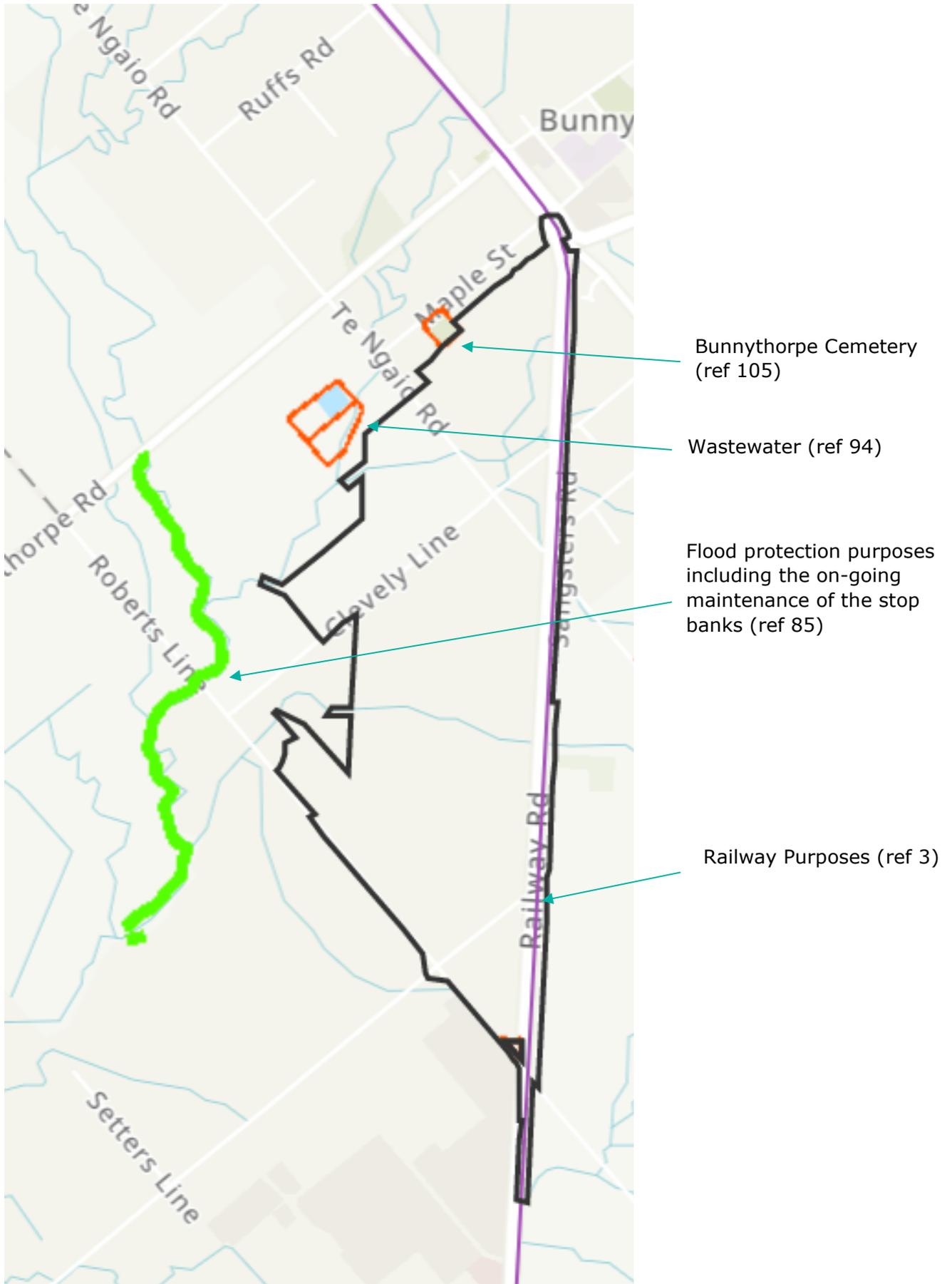


Figure 6 Designations shown on the District Plan maps in the vicinity