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Tēna koe Pam

KiwiRail Regional Freight Hub – Notice of Requirement
Further information required pursuant to s 92 of the Resource Management
Act 1991 (RMA) – air quality and dust effects

Following KiwiRail's response to the s92 request issued in December 2020, the Council's Reporting Officers have undertaken a further review of the information on air quality and dust provided in the Notice of Requirement (NoR) and supporting documentation lodged by KiwiRail for the Regional Freight Hub Project ("the Project"). The Reporting Officers have subsequently compiled a list of requests for further information on air quality and dust, in accordance with s 92 RMA.

The information requested will assist the notified public, Reporting Officers, and subsequently the Hearing Panel, to understand the full nature of the Project and the scale of the potential and actual effects on the environment arising from the Notice of Requirement.

The request for further information under s 92(1) is set out at Schedule 1, attached to this letter.

Please note that a further s92 request may be issued, following a full review of public submissions received on the NOR.

The Reporting Officers welcome a response to the request for further information in accordance with s 92A(1) within 15 working days. Alternatively, please tell us in writing the date you will be providing the information, if you need longer than 15 working days (s92A(1)(b)). If you choose a later date, this date will need to be agreed with the author.

I acknowledge that you have the right to refuse to provide this information under s92A(1)(c). Please inform us in writing within 15 working days of the receipt of this letter, if you do not intend to provide the information requested, or if you wish to agree a later date for provision of the requested information.

If you have any questions about this letter, or would like to discuss it in more detail, please contact Anita Copplestone at anita@kahuenviro.co.nz.

Yours sincerely



Anita Copplestone
S42A Reporting Planner
for the KiwiRail Regional Freight Hub Notice of Requirement
PALMERSTON NORTH CITY COUNCIL

Schedule 1

Dust and Air quality effects

1.1 Requirement for regional consents

1. Please advise whether or not the proposed Freight Hub will be an 'industrial or trade premises' for the purposes of s 15 of the RMA?
2. Stantec indicates that KiwiRail will comply with the air quality requirements of the regional council, or will obtain resource consents. Please provide information on what air quality requirements from the regional council KiwiRail will seek to comply with. Please also advise what activities could require regional consents for air discharges, and what the activity status of these activities would be under the One Plan.

1.2 Construction effects

3. Please provide an assessment of the potential effects on air quality from the construction works. This should include but not be limited to:
 - a) A description of the activities that will give rise to dust e.g. earthworks (cut & fill, bund construction) & vehicle movements. Include approximate location, scale and construction schedule for major earthworks in as much detail as is known or can be assumed.
 - b) A discussion of the relevant air quality assessment criteria.
 - c) A description of the receiving environment, locations of sensitive receptors, (principally dwellings and including distances relative to construction activities), identification of dwellings with roof water collection and evaluation of the risk to roof water supplies.
 - d) A FIDOL¹ assessment to identify the relative risks of dust discharges to result in adverse effects.
 - e) Recommendations for specific mitigation measures to address the potential adverse effects of dust to ensure effects are acceptable, including monitoring if appropriate.

¹ Frequency, intensity, duration, offensiveness and location

1.3 Operational effects

4. Please provide an assessment of the potential effects on air quality from the operational phase (opening year and a future design year at full operational level). This should include but not be limited to:
- a) A description of the activities that will give rise to air emissions e.g. vehicle/trucks movements; locomotive movements; idling; bulk storage and transfer. Include approximate location and scale in as much detail as is known or can be assumed. Air emissions should be considered as a minimum as dust, PM10 and PM2.5.
 - b) A discussion of the relevant air quality assessment criteria.
 - c) A description of the receiving environment, locations of sensitive receptors (principally dwellings), identification of dwellings with roof water collection.
 - d) A FIDOL¹ assessment to identify the relative risks of dust discharges to result in adverse effects.
 - e) Consideration of the potential effects of air borne contaminants on human health, including land transport sources.
 - f) Recommendations for specific mitigation measures to address the potential adverse effects of air contaminants to ensure effects are acceptable, including monitoring if appropriate.
 - g) Deposition of particles on roof water supplies during operation – Stantec notes deposition within 250 metres of the marshalling yards could be an issue and recommends a first flush diverter as a mitigation for roof water collection. Please provide supporting information or reference material in relation to the conclusions reached in section 9.13 of the AEE. In addition, please clarify why only the marshalling yards have been identified as a source that could impact water supplies.
 - h) Comments on odour potential from diesel combustion sources are noted. Are there any other activities associated with the operation that could impact on odour? If so, please assess the potential effect and recommend mitigation.
 - i) What is the potential for dust generation from operation of these areas and is an operational dust management plan appropriate to manage these potential effects?