

KIWI RAIL FREIGHT HUB SUBMISSION FORM



Form 21 – Submission on a Notice of requirement from KiwiRail Holdings
Limited for a designation to accommodate a new regional freight hub

TO: Palmerston North City Council
Private Bag 11-034
Palmerston North 4410
ATTENTION: Democracy & Governance Manager

NUMBER OF PAGES

Continue on separate sheets if necessary

SUBMITTER DETAILS

Full name of Submitter Christopher Joseph Clarke

Postal Address 141 Karori Road

Phone 027 5554531

Karori, Wellington 6012

Email thekarorikid@gmail.com

Signature Chris Clarke

Digitally signed by Chris Clarke
Date: 2021.03.23 12:54:45 +13'00'

(Signature of the person making submission or the person authorised to sign on their behalf. A signature is not required if you are submitting by electronic means.)

1 THE SPECIFIC PARTS OF THE NOTICE OF REQUIREMENT MY SUBMISSION RELATES TO ARE:

This is a general comment, to support the location and the proposal itself.

2 MY SUBMISSION IS: (Comment whether you support, oppose, or are neutral regarding specific parts of the Notice of Requirement or wish to have them amended and the reasons for your view.)

(please see attached page)

- Since my first trip from Auckland to Wellington on the Silver Star overnight train in 1978 I have been a firm advocate of the New Zealand rail network. In the intervening 40+ years we have observed a cyclic waxing and waning of support for the network. I offer to the governance committee the following observation: Transport network investment is like the share market. Short term it may at times look like a bad idea, but the cumulative benefit over time is predictable, and immense. Imagine what Auckland would be like

3 I SEEK THE FOLLOWING RECOMMENDATION OR DECISION FROM THE PALMERSTON NORTH CITY COUNCIL: (Give precise details, including the general nature of any conditions sought)

Say yes.

11-2

4 DO YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION?☐ YES☒ NO**5 IF OTHERS MAKE A SIMILAR SUBMISSION WOULD YOU BE PREPARED TO CONSIDER PRESENTING A JOINT CASE WITH THEM AT ANY HEARING?**☒ YES☐ NO**6A I AM A TRADE COMPETITOR FOR THE PURPOSES OF SECTION 308B OF THE RESOURCE MANAGEMENT ACT 1991**☐ YES (If Yes, go to 6B)☒ NO**6B****I AM DIRECTLY AFFECTED BY AN EFFECT OF THE SUBJECT MATTER OF THE SUBMISSION THAT:**

i. adversely affects the environment; and

ii. does not relate to trade competition or the effects of trade competition

☐ YES (If Yes, comment below)☒ NO**PLEASE SEND YOUR SUBMISSION BY 4PM, 26 MARCH 2021****MAILING TO**Palmerston North City Council
Private Bag 11-034,
Palmerston North
ATTENTION: Democracy & Governance Manager**DELIVERING TO**Council's Contact Services Centre, Civic Administration Building,
Te Marae o Hine: The Square,
Palmerston North
ATTENTION: Democracy & Governance Manager**EMAILING TO**

submission@pncc.govt.nz

YOU MUST SERVE A COPY OF YOUR SUBMISSION ON KIWIRAIL HOLDINGS LIMITED BY**MAILING TO**RMA Team
KiwiRail Holdings Limited
PO Box 593
Wellington 6140**EMAILING TO**

Pam.Butler@kiwirail.co.nz

Please note that your submission (or part of your submission may be struck out if Palmerston North City Council is satisfied that at least one of the following applies to your submission (or part of your submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter

11 – 3
(Christopher J Clarke)

Q2: MY SUBMISSION IS: (Comment whether you support, oppose, or are neutral regarding specific parts of the Notice of Requirement or wish to have them amended and the reasons for your view).

Since my first trip from Auckland to Wellington on the Silver Star overnight train in 1978 I have been a firm advocate of the New Zealand rail network. In the intervening 40+ years we have observed a cyclic waxing and waning of support for the network. I offer to the governance committee the following observation: Transport network investment is like the share market. Short term it may at times look like a bad idea, but the cumulative benefit over time is predictable, and immense. Imagine what Auckland would be like today if they had followed the very strong vocal promotion of an urban rail network by the then mayor Sir Dove-Meyer Robinson. The Manawatu is an ideal location for this proposed hub due to its central location, the stable flat land, and the proximity to Ohakea which will undoubtedly become a significant international airport in the next decade or two. Also New Zealand's climate change response would be massively assisted by a pivot to electrified rail, which would also be a potentially huge contributor to our tourist industry: train travel remains the most romantic and evocative way to go, and naturally takes people through regions rather than flying over them. the next step for the regional freight hub will be a reliable connection to the Wairarapa, through to Napier and on to Gisborne. Concerns around the cost of these developments miss the breadth of the benefits over the long term, and disregard the human potential for designing innovative solutions. Even railways can be 'agile' in their own way, if we fully engage with the idea of flexibility. Who would have dreamed what you could build out of engineered timber? Surely with our topography, our huge timber reserves and our proven moxie and ingenuity we could solve the challenges of compelling train based transport in ways that would enhance our infrastructure, reputation and economy. Elon Musk recently revolutionised the rocket industry with stainless steel. It turns out you don't have to make rockets out of space age materials - or rather, that we had a space age material there all along, but didn't see it because we lacked the imagination to challenge our habitual approach. Just because it hasn't been done before does not mean it cannot be done. Look for and understand what we want to achieve, and go from there. I congratulate Kiwirail for their innovative proposal and urge the council to support it, and to use it as a springboard to do more.

KIWI RAIL FREIGHT HUB 12-1 SUBMISSION FORM



Form 21 – Submission on a Notice of requirement from KiwiRail Holdings Limited for a designation to accommodate a new regional freight hub

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NUMBER OF PAGES 2

Continue on separate sheets if necessary

SUBMITTER DETAILS

Full name of Submitter Central Economic Development Agency

Postal Address PO Box 12005 Palmerston North 4444

Phone 027 801 6434

Email linda.stewart@ceda.nz

Signature

(Signature of the person making submission or the person authorised to sign on their behalf. A signature is not required if you are submitting by electronic means.)

1 THE SPECIFIC PARTS OF THE NOTICE OF REQUIREMENT MY SUBMISSION RELATES TO ARE:

The total Notice of Requirement and all supporting documentation.

2 MY SUBMISSION IS: (Comment whether you support, oppose, or are neutral regarding specific parts of the Notice of Requirement or wish to have them amended and the reasons for your view.)

(please see attached pages) 1. The Central Economic Development Agency (CEDA) support in principle the KiwiRail Regional Freight Hub Notice of Requirement (NoR).

2. CEDA, with the support of Palmerston North City Council and Manawatu District Council has developed a Distribution Hub Strategy 'Servicing the Distribution Needs of the Lower North Island' which confirms Palmerston North in the Manawatu as the natural and logical centre for distribution across the Lower North Island by road, rail and by air.

3 I SEEK THE FOLLOWING RECOMMENDATION OR DECISION FROM THE PALMERSTON NORTH CITY COUNCIL: (Give precise details, including the general nature of any conditions sought)

(please see attached pages) CEDA seeks to ensure a result that will support the following:

- The KiwiRail Freight Hub will be able to connect to the future transport network as detailed in the Waka Kotahi NZTA PNIT Business Case in an efficient and effective manner.

- Investment by new and existing distribution and logistics businesses in the area is maximised through the master planning process to ensure the 'Level 3 Hub' will be able to

4	DO YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION?
<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
5	IF OTHERS MAKE A SIMILAR SUBMISSION WOULD YOU BE PREPARED TO CONSIDER PRESENTING A JOINT CASE WITH THEM AT ANY HEARING?
<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
6A	I AM A TRADE COMPETITOR FOR THE PURPOSES OF SECTION 308B OF THE RESOURCE MANAGEMENT ACT 1991
<input type="checkbox"/> YES (If Yes, go to 6B)	<input checked="" type="checkbox"/> NO
6B	I AM DIRECTLY AFFECTED BY AN EFFECT OF THE SUBJECT MATTER OF THE SUBMISSION THAT: i. adversely affects the environment; and ii. does not relate to trade competition or the effects of trade competition
<input type="checkbox"/> YES (If Yes, comment below)	<input checked="" type="checkbox"/> NO

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EMAILING TO	submission@pncc.govt.nz
YOU MUST SERVE A COPY OF YOUR SUBMISSION ON KIWIRAIL HOLDINGS LIMITED BY	
MAILING TO	RMA Team KiwiRail Holdings Limited PO Box 593 Wellington 6140
EMAILING TO	Pam.Butler@kiwirail.co.nz

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- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
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(Central Economic Development Agency)

Q2: MY SUBMISSION IS: (Comment whether you support, oppose, or are neutral regarding specific parts of the Notice of Requirement or wish to have them amended and the reasons for your view):

1. The Central Economic Development Agency (CEDA) support in principle the KiwiRail Regional Freight Hub Notice of Requirement (NoR).

2. CEDA, with the support of Palmerston North City Council and Manawatu District Council has developed a Distribution Hub Strategy 'Servicing the Distribution Needs of the Lower North Island' which confirms Palmerston North in the Manawatu as the natural and logical centre for distribution across the Lower North Island by road, rail and by express air delivery nationwide, and is well served by two international ports. The KiwiRail Regional Freight Hub is one of four high priority projects vital to unlocking the region's distribution and logistics potential.

3. The potential economic benefits of the KiwiRail Regional Freight Hub are summarised as follows:

a) Distribution and logistics businesses invest in the hub and surrounding industrial areas to take advantage of the time and cost savings for users and their customers as a result of more efficient freight handling, leading to higher productivity

b) Increased volumes of freight able to be processed in Palmerston North, helping to accommodate predicted growth in national and regional freight demand

c) Increased investment by new and existing freight & distribution businesses in Palmerston North, with spill over effects for supporting businesses

d) Reduced costs of building and maintaining roads, as a higher proportion of freight is carried by rail

e) Increased investment by new and existing freight & distribution businesses as Palmerston North becomes a more reliable place to locate transport-dependent businesses

f) Job creation through the build phase as well as through increased investment by new and existing freight and distribution businesses locating and expanding in the city

(Central Economic Development Agency)

g) Central city land released for other higher value uses, e.g. commercial, residential, mixed use

h) Higher central city land values as noise, vibrations, odours, etc. generated by freight & distribution businesses migrate to RFH/NEIZ

i) Reduced transport emissions as every tonne of freight carried by rail has 66% fewer carbon emissions than heavy road freight

j) Safer roads in central Palmerston North as more freight traffic will move out to the hub

4. The region has developed cohesive regional and city plans to ensure the area develops as a key freight and distribution hub in New Zealand. CEDA notes that the KiwiRail Regional Freight Hub NoR is generally consistent with these. The following plans are of particular relevance:

a) 2018 Palmerston North Spatial Plan and 2021 Draft Spatial Plan

b) 2018 PNCC City Development Strategy and Draft 2021 City Development Strategy

c) 2018 Infrastructure Strategy and Draft 2021 Infrastructure Strategy

d) Draft CEDA Distribution Hub Strategy

e) Draft 2021 Manawatu-Whanganui Regional Spatial Plan

f) 2018 Regional Land Transport Plan and Draft 2021 Regional Land Transport Plan

g) 2010 Joint Transport Study

h) 2021 NZTA PNITI Business Case

i) Historical PNCC land-use strategies that identified the NEIZ for large freight, distribution and logistics development.

5. CEDA, in collaboration with Palmerston North City Council and Manawatu District Council will lead the Central New Zealand Distribution Hub Steering Group to collaboratively implement the Distribution Hub Strategy, with the aim of achieving maximum mutual benefits from activities such as advocacy and engagement, brand and identity, communications and marketing, partnership development with central government agencies, master planning, funding and delivery.

6. CEDA expects master planning to deliver integrated stormwater/flooding infrastructure and transport connections, including with Palmerston North Airport. This infrastructure will enable 'Level 2 Users' in the North East Industrial Zone (NEIZ) to access the KiwiRail Freight Hub. Additional benefits that will be derived from master planning include iwi partnerships, NEIZ expansion, coordinated delivery of Palmerston North Integrated Transport Initiative, housing to support increased employment in the area, and quality urban and amenity planning and design.

Q3: I SEEK THE FOLLOWING RECOMMENDATION OR DECISION FROM THE PALMERSTON NORTH CITY COUNCIL: (Give precise details, including the general nature of any conditions sought)

CEDA seeks to ensure a result that will support the following:

- The KiwiRail Freight Hub will be able to connect to the future transport network as detailed in the Waka Kotahi NZTA PNITI Business Case in an efficient and effective manner.

- Investment by new and existing distribution and logistics businesses in the area is maximised through the master planning process to ensure the 'Level 2 User' will be able to access the KiwiRail rail infrastructure. Specifically, this means the development of the land should enable future opportunities for infrastructure adjustment and upgrading as freight movements increase between all parts of the hub, airport and NEIZ.

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Private Bag 11-034
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ATTENTION: Democracy & Governance Manager

NUMBER OF PAGES

3

Continue on separate sheets if necessary

SUBMITTER DETAILS

Full name of Submitter Tutaki 2019 Ltd

Postal Address PO Box 4114

Phone 06 356 8516 ext5

Manawatu Mail Centre, Palmerston North 4442

Email nathan@farmgear.co.nz

Signature

(Signature of the person making submission or the person authorised to sign on their behalf. A signature is not required if you are submitting by electronic means.)

1

THE SPECIFIC PARTS OF THE NOTICE OF REQUIREMENT MY SUBMISSION RELATES TO ARE:

The direct and indirect, local and district-wide road network, safety and environmental effects (effects on the environment) of the proposed "Access roads, and changes to existing road layouts and intersections" set out in Volume 3, C: Integrated Transport Assessment, including: 1. proposed re-arrangement of access to the Submitters land and the business of its occupier at 422A Railway Road; and 2. The proposed redesign of the intersection at Railway Road and Roberts Line including Sangsters Road.

2

MY SUBMISSION IS: (Comment whether you support, oppose, or are neutral regarding specific parts of the Notice of Requirement or wish to have them amended and the reasons for your view.)

Oppose the "Access roads, and changes to existing road layouts and intersections" as set out in Volume 3, C: Integrated Transport Assessment for the reasons set out in the attached additional pages.

3

I SEEK THE FOLLOWING RECOMMENDATION OR DECISION FROM THE PALMERSTON NORTH CITY COUNCIL: (Give precise details, including the general nature of any conditions sought)

see attached

4 DO YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION?☒ YES☐ NO**5 IF OTHERS MAKE A SIMILAR SUBMISSION WOULD YOU BE PREPARED TO CONSIDER PRESENTING A JOINT CASE WITH THEM AT ANY HEARING?**☒ YES☐ NO**6A I AM A TRADE COMPETITOR FOR THE PURPOSES OF SECTION 308B OF THE RESOURCE MANAGEMENT ACT 1991**☐ YES (If Yes, go to 6B)☒ NO**6B I AM DIRECTLY AFFECTED BY AN EFFECT OF THE SUBJECT MATTER OF THE SUBMISSION THAT:**
i. adversely affects the environment; and
ii. does not relate to trade competition or the effects of trade competition☒ YES (If Yes, comment below)☐ NO

see attached

PLEASE SEND YOUR SUBMISSION BY 4PM, 26 MARCH 2021

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DELIVERING TO	Council's Contact Services Centre, Civic Administration Building, Te Marae o Hine: The Square, Palmerston North ATTENTION: Democracy & Governance Manager
EMAILING TO	submission@pncc.govt.nz

YOU MUST SERVE A COPY OF YOUR SUBMISSION ON KIWIRAIL HOLDINGS LIMITED BY

MAILING TO	RMA Team KiwiRail Holdings Limited PO Box 593 Wellington 6140
EMAILING TO	Pam.Butler@kiwirail.co.nz

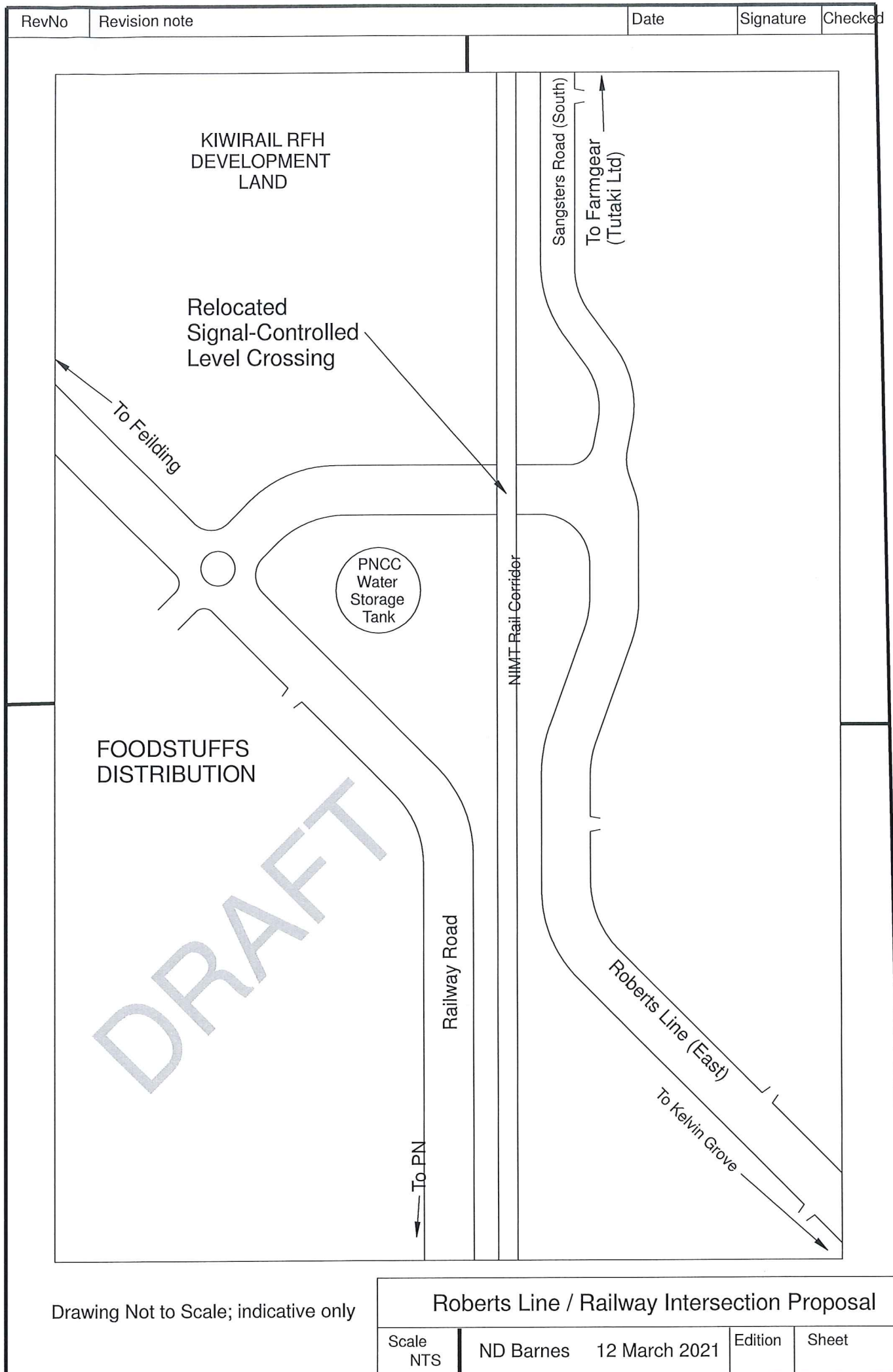
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Additional Page to submission by Tutaki 2019 Ltd

Tutaki's submission relates to the Integrated Transport Assessment of the KiwiRail NOR:

1. Tutaki submits that there is a significant lack of integration in the KiwiRail transport proposal resulting in:
 - Disconnection of Tutaki from available capacity in the District's main transport and arterial routes.
 - A sub-standard alternative connection for Tutaki that is a remote, end-of-the-line alternative which will unnecessarily hamper access to and from Tutaki's site with a considerable loss of service for its suppliers, customers, employees, and logistics operators.
 - Increased pressure and loss of service on an already-overloaded stretch of Tremaine Avenue, and the Tremaine / Railway Road intersection, and
 - Severed connections between where communities live and work including the proposed new freight hub, and/or between two industrial zones which are traffic generators.
2. Tutaki acknowledges that the existing level crossing and intersection at Roberts Line/ Railway Road are dangerous, and in need of re-design, but submits that there are sustainable alternatives to closure, which properly provide for and balance the various interests of the wider community.
3. The proposal in its present form will cause a significant loss of service with corresponding economic impacts for businesses, other than KiwiRail.
4. The proposal is able to be significantly improved so as to meet appropriate safety standards without compromising levels of service to the north, east and south of the proposed new freight hub. An intersection design similar to the intersection and level crossing at Campbell and Waugh's Roads in the vicinity of Newbury Line would likely mitigate existing and future safety issues whilst maintaining a more direct connection east and west of the NIMT, and appropriate levels of service.
5. An indicative sketch of a feasible alternative is attached. Variations of this alternative or other options might similarly address and resolve the issues raised by this submission.
6. In addition to a redesigned Roberts Line/Railway Road level crossing and intersection, Tutaki submits that any proposed formation of Sangsters Road should properly include carriageway width capable of safe use by in-going and out-going vehicles, including trucks, with safe north and south connections to Cleverly and Roberts Lines respectively.
7. Tutaki seeks such additional, related, alternative or consequential relief as may better give effect to this submission.
8. Tutaki is not a trade competitor of KiwiRail.
9. Tutaki wishes to be heard in support of its submission.



KIWIRAIL FREIGHT HUB SUBMISSION FORM



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NUMER OF PAGES

Continue on separate sheets if necessary

SUBMITTER DETAILS

FullnameofSubmitter **Nga Kaitiaki O Ngati Kauwhata Incorporated**

Postal Address C/o 19 Aspiring Avenue, Milson PALMERSTON NORTH 4414

Or The Iwi Offices at 139 South Street, FEILDING – PO Box 486, FEILDING

Phone +64 027 4753-293

Email db.emery@xtra.co.nz – Co-Chairman

Signature

(Signature of the person making submission or the person authorised to sign on their behalf. A signature is not required if you are submitting by electronic means.)

1

THE SPECIFIC PARTS OF THE NOTICE OF REQUIREMENT MY SUBMISSION RELATES TO ARE:

This submission relates to the whole Kiwi Rail Regional Freight Hub and Inland port proposal. Specific parts of the proposal which are of concern include but are not limited to: In 1870, Ngati Kauwhata had the Public Works Act used against them, with Iwi Maori owned stolen by the Crown, the subsequent acquisition and alienation of ancestral lands; reclamation of water bodies; discharge of stormwater and effects on te mana o te wai; modification and destruction of wahi tapu; effects on the mauri and hauora of our Ngati Kauwhata people; contamination of soils and whenua; impacts on significant ecological habitats; restrictions on public access to waterbodies; impacts on mahinga kai and impacts on nearby roading.

Ngati Kauwhata is a separate Iwi in its own right, and through its Tainui Waka Whakapapa connections has its own separate takiwā or tribal boundaries, three (3) gazetted Marae, and known Hapu or sub-tribes and mandated Iwi authority based in Feilding.

It is currently providing evidence and submission to the Waitangi Tribunal in the Porirua -ki-Manawatu Rangitikei Enquiry area.

Therefore, Ngati Kauwhata will not agree to any conditions or terms which will usurp or undermine its Waitangi Tribunal claims (WAI 1461) and settlement process.

Ngati Kauwhata is currently negotiating a Kawenata -Relationship Agreement with the Board, CEO and Executive Management of Kiwi Rail NZ.

With the support of Kiwi Rail NZ, Ngati Kauwhata negotiators will seek and offer alliance or collaborations opportunities to neighbouring Iwi to enable a successful, futuristic project for the overall benefit of Palmerston North City, Bunnythorpe, Feilding and Manawatu District area

That the territorial authority recommends to the consenting authority that it withdraw the current NOR requirements to enable positive and conducive dialogue and discussions with Kiwi Rail NZ to continue.

Alternatively, that the territorial authority PNCC, recommends to the consenting authority that it modify the requirement and impose conditions to the effect that it creates a decision-making panel similar to Te Ahu-O-Turanga Roding Alliance, stipulating that Ngati Kauwhata as holding jurisdiction and authority (mana whenua status) but in collaborations with neighbouring Iwi such as Rangitaane O Manawatu and Ngati Raukawa-ki-te-Tonga to participate in the process.

Signed:



Dennis Emery – Co-Chairman on Behalf of the Management Committee.

DATE : Wednesday, March 24, 2021

4 DO YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION?

☒ YES☐ NO

5 IF OTHERS MAKE A SIMILAR SUBMISSION WOULD YOU BE PREPARED TO CONSIDER PRESENTING A JOINT CASE WITH THEM AT ANY HEARING?

☐ YES☒ NO

6A I AM A TRADE COMPETITOR FOR THE PURPOSES OF SECTION 308B OF THE RESOURCE MANAGEMENT ACT 1991

☐ YES (If Yes, go to 6B)☒ NO

6B I AM DIRECTLY AFFECTED BY AN EFFECT OF THE SUBJECT MATTER OF THE SUBMISSION THAT:

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 ii. does not relate to trade competition or the effects of trade competition

☒ YES (If Yes, comment below)☐ NO

. Ngati Kauwhata is a separate Iwi in its own right, and through its Tainui Waka Whakapapa connections has its own separate takiwā or tribal boundaries, three (3) gazetted Marae, and known Hapu or sub-tribes and mandated Iwi authority based in Feilding.

It is currently providing evidence and submission to the Waitangi Tribunal in the Porirua -ki-Manawatu Rangitikei Enquiry area.

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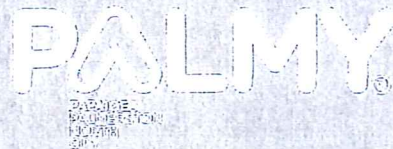
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SUBMITTER DETAILS

Full name of Submitter **Maree Woods**

Postal Address **55 Parris Road
RD 10
Palmerston North 4470**

Phone **027 6693182**

Email **woodsfam@extra.co.nz**

Signature **mz Woods**

(Signature of the person making submission or the person authorised to sign on their behalf. A signature is not required if you are submitting by electronic means.)

1 THE SPECIFIC PARTS OF THE NOTICE OF REQUIREMENT MY SUBMISSION RELATES TO ARE:

I am very concerned about the negative impact that the Freight Hub will have on lifestyle properties, and the community feel of Bunnythorpe village.

2 MY SUBMISSION IS CONCERNED WHETHER YOU SUPPORT, OPPOSE OR ARE NEUTRAL REGARDING SPECIFIC PARTS OF THE NOTICE OF REQUIREMENT. PLEASE TICK ONE OF THE FOLLOWING BOXES:

Landscape - our semi rural landscape will be scarred and disappear.

**Noise - train noises will become more frequent and louder
- the 'beeping' noises from folk lifts and log loading machinery
Light - we will lose our view of the stars at night.
- lighting will keep us awake
Road changes - removing Railway Road will impact our ease of access to the city
Dust will blow pollutants onto our roof which is our water system**

3 I SEEK THE FOLLOWING RECOMMENDATION OR DECISION FROM THE PALMERSTON NORTH CITY COUNCIL (the proposed actions, including the potential issue of any conflicting rights)

I request the PNCC declines Kiwi Rail's requirement for designation for the Freight Hub.

4 DO YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION?

☐ YES ☒ NO

5 IF OTHERS MAKE A SIMILAR SUBMISSION WOULD YOU BE PREPARED TO CONSIDER PRESENTING A JOINT CASE WITH THEM AT ANY HEARING?

☒ YES ☐ NO

6A I AM A TRADE COMPETITOR FOR THE PURPOSES OF SECTION 80B OF THE RESOURCE MANAGEMENT ACT 1991

☐ YES (If Yes, go to 6B) ☒ NO

6B I AM DIRECTLY AFFECTED BY AN EFFECT OF THE SUBJECT MATTER OF THE SUBMISSION THAT:

6B1 SIGNIFICANTLY AFFECTS THE ENVIRONMENTAL SSSI

6B2 DOES NOT LEAD TO TRADE COMPETITION OR THE EFFECTS OF TRADE COMPETITION

☒ YES (If Yes, comment below) ☐ NO

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SUBMITTER DETAILS

Full name of Submitter **Martin Jones**

Postal Address **27 Sangsters Road**

Phone **0274466443**

RD10 Palmerston North

Email **Marty4certs@xtra.co.nz**

Signature

(Signature of the person making submission or the person authorised to sign on their behalf. A signature is not required if you are submitting by electronic means.)

1 THE SPECIFIC PARTS OF THE NOTICE OF REQUIREMENT MY SUBMISSION RELATES TO ARE:

Noise and mechanical vibrations dust (during the construction phase) and lighting

2 MY SUBMISSION IS: (Comment whether you support, oppose, or are neutral regarding specific parts of the Notice of Requirement or wish to have them amended and the reasons for your view.) **SEE PAGE 16-3 & 16-4**

I am opposed to the redesignation of the land required by KiwiRail to construct this yard
On the basis that the accoustics report compiled and submitted by Kiwirail is
fundamentally flawed

The report used a totally irrelevant standard as the basis for accessing noise impact on
adjoining properties (the report uses a Norwegian standard relevant to Airport
operations)

The correct standard used should have been ISO14027 and ISO2005

3 I SEEK THE FOLLOWING RECOMMENDATION OR DECISION FROM THE PALMERSTON NORTH CITY COUNCIL: (Give precise details, including the general nature of any conditions sought) **SEE PAGE 16-3 & 16-4**

(A) that the redesignation of this site should not go ahead until reports using the correct
and relevant international standards has been conducted and distributed for the
consideration of effected parties

(B) That Kiwirail should reconsider their preferred sight based upon community
impact ,and the real cost of this sight compared to the other available options

(C) should the yard go ahead (and Im sure that any amount of objections will make no
difference to this happening) that the foot print of the yard should be reduced to only

4	DO YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION?
<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
5	IF OTHERS MAKE A SIMILAR SUBMISSION WOULD YOU BE PREPARED TO CONSIDER PRESENTING A JOINT CASE WITH THEM AT ANY HEARING?
<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
6A	I AM A TRADE COMPETITOR FOR THE PURPOSES OF SECTION 308B OF THE RESOURCE MANAGEMENT ACT 1991
<input type="checkbox"/> YES (If Yes, go to 6B)	<input checked="" type="checkbox"/> NO
6B	I AM DIRECTLY AFFECTED BY AN EFFECT OF THE SUBJECT MATTER OF THE SUBMISSION THAT: i. adversely affects the environment; and ii. does not relate to trade competition or the effects of trade competition
<input checked="" type="checkbox"/> YES (If Yes, comment below)	<input type="checkbox"/> NO
<div></div> <div></div> <div></div>	

PLEASE SEND YOUR SUBMISSION BY 4PM, 26 MARCH 2021	
MAILING TO	Palmerston North City Council Private Bag 11-034, Palmerston North ATTENTION: Democracy & Governance Manager
DELIVERING TO	Council's Contact Services Centre, Civic Administration Building, Te Marae o Hine: The Square, Palmerston North ATTENTION: Democracy & Governance Manager
EMAILING TO	submission@pncc.govt.nz
YOU MUST SERVE A COPY OF YOUR SUBMISSION ON KIWIRAIL HOLDINGS LIMITED BY	
MAILING TO	RMA Team KiwiRail Holdings Limited PO Box 593 Wellington 6140
EMAILING TO	Pam.Butler@kiwirail.co.nz

Please note that your submission (or part of your submission may be struck out if Palmerston North City Council is satisfied that at least one of the following applies to your submission (or part of your submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter

Q2: MY SUBMISSION IS: (Comment whether you support, oppose, or are neutral regarding specific parts of the Notice of Requirement or wish to have them amended and the reasons for your view).

I am opposed to the rededication of the land required by KiwiRail to construct this yard

On the basis that the acoustics report compiled and submitted by Kiwirail is fundamentally flawed

The report used a totally irrelevant standard as the basis for assessing noise impact on adjoining properties (the report uses a Norwegian standard relevant to Airport operations)

The correct standard used should have been ISO14837 and ISO3095

The current report assumes hours and times of operation that are not relevant to a 24 hour a day railway operation

Also no consideration has been given Vibration created in the operation of rail equipment

There has been no lighting survey conducted and presented for affected parties consideration

Even with the flawed report that has been presented sections of our property falls within the 60-65DBA zone (totally not acceptable) area and the rest of our property falls within the 55-60 DBZ zone

And this is with the 5 meter sound wall

It is my contention that had the correct reports been carried out far more properties would fall within the 60-65 DBA zone and would therefore fall within the Totally unacceptable zone

I also understand that the earth works and drainage issues related to this site far exceed those required at several of the other sites previously considered

I am led to understand that the ground work alone will take in the vicinity of 3 years to complete before any actual building can take place

The impact on our living conditions and day to day lives is unacceptable both during the construction phase and eventually the operation of the yard itself

Q3: I SEEK THE FOLLOWING RECOMMENDATION OR DECISION FROM THE PALMERSTON NORTH CITY COUNCIL: (Give precise details, including the general nature of any conditions sought):

(A) that the redesignation of this site should not go ahead until reports using the correct and relevant international standards has been conducted and distributed for the consideration of effected parties

(B) That Kiwirail should reconsider their preferred sight based upon community impact ,and the real cost of this sight compared to the other available options

(C) should the yard go ahead(and Im sure that any amount of objections will make no difference to this happening) that the foot print of the yard should be reduced to only be capable of handling the current 800meter in length trains)

This is based upon the fact that no other part of the current kiwirail network is capable of handling 1500meter trains

KIWIRAIL FREIGHT HUB SUBMISSION FORM



Form 21 – Submission on a Notice of requirement from KiwiRail Holdings
Limited for a designation to accommodate a new regional freight hub

TO: Palmerston North City Council
Private Bag 11-034
Palmerston North 4410
ATTENTION: Democracy & Governance Manager

NUMBER OF PAGES

2

Continue on separate sheets if necessary

SUBMITTER DETAILS

Full name of Submitter Nicola Schreurs and Thomas Good

Postal Address 304 Te Ngaio Road

Phone 02102965092

RD 8, Palmerston North 4478

Email N.M.Schreurs@massey.ac.nz

Signature

(Signature of the person making submission or the person authorised to sign on their behalf. A signature is not required if you are submitting by electronic means.)

1 THE SPECIFIC PARTS OF THE NOTICE OF REQUIREMENT MY SUBMISSION RELATES TO ARE:

All parts

2 MY SUBMISSION IS: (Comment whether you support, oppose, or are neutral regarding specific parts of the Notice of Requirement or wish to have them amended and the reasons for your view.) **SEE ATTACHED PAGES**

We oppose the Notice of Requirement for the following reasons:

1. Lack of integration with industry

One of the reasons the current area was designated for the KiwiRail Regional Freight Hub was its position next to the North Eastern Industrial Zone and the airport. If the location next to this industrial was so important for the KiwiRail Regional Freight Hub why has the plan and design not included sidings into the North Eastern Industrial Zone. As the plan currently roads, goods and produce from the current businesses within the North Eastern

3 I SEEK THE FOLLOWING RECOMMENDATION OR DECISION FROM THE PALMERSTON NORTH CITY COUNCIL: (Give precise details, including the general nature of any conditions sought) **SEE ATTACHED PAGES**

We seek that Palmerston North City Council advise KiwiRail to find an alternative site for the KiwiRail Regional Freight Hub. This can be justified due to the lack of integration of the KiwiRail Regional Freight Hub with existing industry and amenities, short-comings of the acoustic assessment and the designated land being of more value for housing. These are outlined in the submission section. The high land value and substantial engineering challenges (waterways, flooding risk, undulating terrain, substantial drainage considerations, noise mitigation, relocation of recently installed coverage lines and

4 DO YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION?☒ YES☐ NO**5 IF OTHERS MAKE A SIMILAR SUBMISSION WOULD YOU BE PREPARED TO CONSIDER PRESENTING A JOINT CASE WITH THEM AT ANY HEARING?**☒ YES☐ NO**6A I AM A TRADE COMPETITOR FOR THE PURPOSES OF SECTION 308B OF THE RESOURCE MANAGEMENT ACT 1991**☐ YES (If Yes, go to 6B)☒ NO**6B****I AM DIRECTLY AFFECTED BY AN EFFECT OF THE SUBJECT MATTER OF THE SUBMISSION THAT:**

- i. adversely affects the environment; and
- ii. does not relate to trade competition or the effects of trade competition

☒ YES (If Yes, comment below)☐ NO

Property is within the designated area

PLEASE SEND YOUR SUBMISSION BY 4PM, 26 MARCH 2021

MAILING TO	Palmerston North City Council Private Bag 11-034, Palmerston North ATTENTION: Democracy & Governance Manager
DELIVERING TO	Council's Contact Services Centre, Civic Administration Building, Te Marae o Hine: The Square, Palmerston North ATTENTION: Democracy & Governance Manager
EMAILING TO	submission@pncc.govt.nz

YOU MUST SERVE A COPY OF YOUR SUBMISSION ON KIWIRAIL HOLDINGS LIMITED BY

MAILING TO	RMA Team KiwiRail Holdings Limited PO Box 593 Wellington 6140
EMAILING TO	Pam.Butler@kiwirail.co.nz

Please note that your submission (or part of your submission may be struck out if Palmerston North City Council is satisfied that at least one of the following applies to your submission (or part of your submission):

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Q2: MY SUBMISSION IS: (Comment whether you support, oppose, or are neutral regarding specific parts of the Notice of Requirement or wish to have them amended and the reasons for your view.)

We oppose the Notice of Requirement for the following reasons:

1. Lack of integration with industry

One of the reasons the current area was designated for the KiwiRail Regional Freight Hub was its position next to the North Eastern Industrial Zone and the airport. If the location next to this industrial was so important for the KiwiRail Regional Freight Hub why has the plan and design not included sidings into the North Eastern Industrial Zone. As the plan currently reads, goods and produce from the current businesses within the North Eastern Industrial Zone or airport would still need to be trucked to the KiwiRail Regional Freight Hub (and from the Hub to the North Eastern Industrial Zone). The current design and layout of the KiwiRail Regional Freight Hub, as indicated in the Landscape Plan, has a single main entrance which is furnished with a roundabout at the point where it intersects the road which will be one of the main thoroughfares for traffic from Feilding and Northern townships into Palmerston North. This indicates that trucks or vehicles from the KiwiRail Regional Freight Hub will be required to navigate, and integrate with, vehicle traffic on what is likely to be a busy road. Given that the whole idea of the KiwiRail Regional Freight Hub was to remove trucks from the road, the current design seems counter-intuitive. The fact that the plans of the KiwiRail Regional Freight Hub indicate that there is no rail link with the industrial zone or the airport, completely defeats the purpose of the current location. From my interpretation of the plan and design of the KiwiRail Regional Freight Hub the current site is not essential as the designated site because goods will need to be trucked anyway. This warrants the consideration of other sites that use less valuable land, have less engineering challenges and will have far less imposition on Palmerston North and Manawatu community members, which in-turn will reduce the costs associated with establishing the KiwiRail Regional Freight Hub that would ultimately be the incumbrance of the New Zealand taxpayer.

2. Designated land has value for housing and is a costly option

The land designated for the KiwiRail Regional Freight Hub incorporates numerous lifestyle and rural properties with established homes (Schedule of Landowners indicates 66 properties without including those parcels of land designated as road or rail) that have been developed by the landowners with the intention of them being family homes. There would be a further substantial number of established homes neighbouring the proposed location of the KiwiRail Regional Freight Hub that will have the value of their property and their earned lifestyle diminished. The land designated for the KiwiRail Regional Freight Hub has value for housing and the lack of foresight by KiwiRail and the Palmerston North City Council for setting aside land at a preceding time has meant that the land has been developed into homes and lifestyle properties. For many, this includes their “dream” properties for which they have worked hard to develop with substantial input of time and money. For the land designated by the KiwiRail Regional Freight Hub plan, the long-term development of the land by current and previous landowners has resulted in the properties increasing in value over the past decades. Consequently, when compared to other potential sites for a Rail Freight Hub, the land within the currently designated area is expensive and will dramatically increase the cost for establishing the KiwiRail Regional Freight Hub that would ultimately be the incumbrance of the New Zealand taxpayer.

3. Acoustic assessment has shortcomings

The acoustic assessment has not accurately considered trains that will have larger loads and that there will be a more concentrated number of trains on the KiwiRail Regional Freight Hub site to match the productivity that the Regional Freight Hub is proposed to provide. The Acoustic Assessment states that “effects associated with future increases in railway traffic on the NIMT have not been assessed, as these could occur regardless of whether the Freight Hub is disturbance located in the proposed location, or somewhere else in the region” This however, is a false assumption because, the aim of the KiwiRail Regional Freight Hub is to increase economic productivity and in part proposes to achieve this via being able to congregate trains within the KiwiRail Regional Freight Hub site and also by means of trains carrying a larger load. These two aspects are going to create increased acoustic disruption as heavier loaded trains would be expected to create more vibration and more engine noise. Also, the KiwiRail Regional Freight Hub will create a concentrated activity of on-site trains (e.g. shunting, accelerating and decelerating under

increased load) this will also concentrate the acoustic (noise and vibration) disturbance. Therefore, the acoustic assessment seems inadequate and the design features of the KiwiRail Regional Freight Hub to mitigate acoustic issues, based on the acoustic assessment, are therefore likely to be insufficient.

Q3: I SEEK THE FOLLOWING RECOMMENDATION OR DECISION FROM THE PALMERSTON NORTH CITY COUNCIL: (Give precise details, including the general nature of any conditions sought):

We seek that Palmerston North City Council advise KiwiRail to find an alternative site for the KiwiRail Regional Freight Hub. This can be justified due to the lack of integration of the KiwiRail Regional Freight Hub with existing industry and amenities, short-comings of the acoustic assessment and the designated land being of more value for housing. These are outlined in the submission section. The high land value and substantial engineering challenges (waterways, flooding risk, undulating terrain, substantial drainage considerations, noise mitigation, relocation of recently installed sewerage lines and broadband etc) associated with the currently designated site for the KiwiRail Regional Freight Hub can also be cited as unfairly adding cost for the taxpayer that could be avoided by selecting another site.

KIWI RAIL FREIGHT HUB SUBMISSION FORM

ORIGINAL TO FOR ACTION AND REPLY		
REC'D	24 MAR 2021	PNOC
COPY TO		
1.		



Form 21 – Submission on a Notice of requirement from KiwiRail Holdings Limited for a designation to accommodate a new regional freight hub

TO: Palmerston North City Council
Private Bag 11-034
Palmerston North 4410
ATTENTION: Democracy & Governance Manager

NUMBER OF PAGES

5

Continue on separate sheets if necessary

SUBMITTER DETAILS

Full name of Submitter **Kevin and Yvonne Stafford**

Postal Address **684 Roberts Line**

Phone **06 3589726**

Palmerston North 4470

Email **k.j.stafford@massey.ac.nz**

Signature

23/3/2021

(Signature of the person making submission or the person authorised to sign on their behalf. A signature is not required if you are submitting by electronic means.)

1 THE SPECIFIC PARTS OF THE NOTICE OF REQUIREMENT MY SUBMISSION RELATES TO ARE:

Volume 1; Appendix 2
Volume 1; Appendix 3 Parts b,c,f,h,1

2 MY SUBMISSION IS: (Comment whether you support, oppose, or are neutral regarding specific parts of the Notice of Requirement or wish to have them amended and the reasons for your view.)

We wish to have some parts adjusted to minimise the impact the development will have on the lives of those people living close to the development (see attached)

3 I SEEK THE FOLLOWING RECOMMENDATION OR DECISION FROM THE PALMERSTON NORTH CITY COUNCIL: (Give precise details, including the general nature of any conditions sought)

That the development starts by (1) putting in place structures to minimise its negative impacts with regard to noise, dust and lighting; (2) placing roadways to enable inhabitants to access a road; (3) place drainage to ensure that stormwater is flows across or around the development from the East side and (5) compensate those who live adjacent to the development for the losses they sustain in the devaluation of their properties.

4 DO YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION?☒ YES☐ NO**5 IF OTHERS MAKE A SIMILAR SUBMISSION WOULD YOU BE PREPARED TO CONSIDER PRESENTING A JOINT CASE WITH THEM AT ANY HEARING?**☒ YES☐ NO**6A I AM A TRADE COMPETITOR FOR THE PURPOSES OF SECTION 308B OF THE RESOURCE MANAGEMENT ACT 1991**☐ YES (If Yes, go to 6B)☒ NO**6B I AM DIRECTLY AFFECTED BY AN EFFECT OF THE SUBJECT MATTER OF THE SUBMISSION THAT:**
i. adversely affects the environment; and
ii. does not relate to trade competition or the effects of trade competition☒ YES (If Yes, comment below)☐ NO

(Attached)

PLEASE SEND YOUR SUBMISSION BY 4PM, 26 MARCH 2021**MAILING TO**Palmerston North City Council
Private Bag 11-034,
Palmerston North
ATTENTION: Democracy & Governance Manager**DELIVERING TO**Council's Contact Services Centre, Civic Administration Building,
Te Marae o Hine: The Square,
Palmerston North
ATTENTION: Democracy & Governance Manager**EMAILING TO**

submission@pncc.govt.nz

YOU MUST SERVE A COPY OF YOUR SUBMISSION ON KIWIRAIL HOLDINGS LIMITED BY**MAILING TO**RMA Team
KiwiRail Holdings Limited
PO Box 593
Wellington 6140**EMAILING TO**

Pam.Butler@kiwirail.co.nz

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Submission re Regional Freight Hub

We live at the corner of Railway Road and Roberts Line adjacent to the Railway, to the North East of the crossroads. We will be affected by the development of the regional freight hub in several ways. The hub will be a large civil engineering project which will take place over several years. During this time and thereafter there will be a large increase in activity on the hub site.

People who live adjacent to the land on which this activity will occur will be affected by it personally and financially. The noise, dust, lighting and disturbance caused by the development and changes in the local roadways will affect the pleasure many of us have experienced in living on our lifestyle blocks and farms adjacent to or near the land being used for this development. Moreover, the value of our properties will be reduced, indeed this has already happened.

This submission relates to issues pertaining to the activities of Kiwirail, Palmerston North City Council and New Zealand Transport. It is impossible to discuss one in isolation for the others and it is important that all three cooperate as by doing so they will make the overall development of this facility efficient.

The effects the development will have on the people living adjacent to it can be reduced if it is progressed in a manner which takes the effects listed above and detailed below into account.

At present there are many details missing from the plan and some of these will be discussed in this submission. This is a personal submission, but it contains both general observations and, details which pertain to our specific situation.

The development should progress by:

1. Building the noise-reducing wall at the start of the development.
2. Ensuring that drainage of storm water is managed so that it flows away from properties around the development.
3. Making the road developments at the start of or before the railway development begins.
4. Reducing noise irritation for those dwelling near to the development by placing double glazing in their houses.
5. Quantifying the reduction in value of the properties adjacent to the development and compensating the resident appropriately.

Noise reducing wall

This development is going to take up to a decade. During this time there will be much noise, dust and disturbance on the site of the development and on surrounding properties. This is unavoidable. The impact of these on the residents living adjacent to the development should be considered and the impact of these disturbances should be reduced by building the anti-noise wall before the development starts. This wall as shown in the plans will reduce the disturbance.

Planning to build the wall later on during the development or at the end is simply cruelty, and as it is a cost which has to be met, the earlier it is build the cheaper it will be and the better it will be for everyone concerned.

Stormwater management

During the planning for the industrial development adjacent to the railway development (Railway Road/Roberts Line) the planners did not plan for stormwater management. Indeed, at an early meeting of residents and planners the latter were surprised when local residents informed them of the volume of stormwater that would flow into the Mangoni Stream after 10mm of rainfall on the roofs and roadways planned for the industrial zone. This volume of water would have flooded areas of the city. Eventually the planners included plans for stormwater management, but they had to increase the size of the culverts twice or three times to take the stormwater flow. This still left an area at the northern end of the development beside Railway Road which floods and becomes a large pond every winter. Indeed, even the birds know of this and I have seen a Royal Spoonbills feeding in this shallow lagoon.

It is important to manage the volume of stormwater which will flow off the sheds and yards as development progresses. There is also a need to ensure that natural run off water from properties on the east side of the present railway line is allowed to flow (1) northwards along the railway from the Roberts Line crossroads; (2) under the railway westwards in several locations from Roberts Line northwards and (3) to the South East in the drains along Roberts Line.

This is an important component of the development and much more detail is required to demonstrate an understanding of the issues involved.

Road development

Railway Road is a very busy road and the traffic flowing to and from Palmerston North along this road must be managed before the time when Railway Road adjacent to the development is closed. This means that NZT, PNCC and Kiwirail must cooperate to develop adequate roads to accommodate future needs.

There is too little detail about how and when these roads will be constructed and when and what roads and rail crossing will be closed off.

There are at least two properties that cross the railway to get onto Railway road just north of the Roberts Line crossing and these properties will have to be given access via Sangsters Road to Roberts Line.

PNCC is planning to put a bicycle track and walkway along the paper road section and formed portion of Sangsters Line in the 2021-2022 financial year to connect the city and Feilding. This should be placed at the same time as a roadway is constructed from these properties (mentioned above), which use the railway crossing near Richardsons Line, to Roberts Line.

There needs to be coordination between all three organization to facilitate this aspect of the development.

This roadway, walking and cycling track will affect us directly as we use the section of the paper road portion of Sangsters line for access to our house and property. We have permission to do this and access our house from Roberts Line just beside the railway crossing. We will need to have access to our house along Sangsters line during and after the road/walkway/cycling track development. So, we recognize that our entrance presently at Roberts Line will be shifted along the paper road and we

want the 5 access gates along the fence between our property and the paper road section of Sangsters line to remain.

We have permission to subdivide our properties (2 titles) into 7 blocks and have held off doing this due to the rail development. We would like for the permission to subdivide our properties to be extended until after the development is completed. It is impossible to consider doing this now due to the amount of disquiet and concern regarding the development.

Double Glazing

The noise from the development will be forever once the work starts, initially from the development itself and then from the increased railway work, shunting etc. To reduce the impact this will have on residents living adjacent to the development the placement of double glazing in their houses would make their experience of this development less unpleasant. This along with increased insulation in roofs will reduce noise and counter the loss in value of the houses sited close to the development.

Loss of value of property

Every property adjacent to the development has and will continue to lose value due to the development. This short, and longer-term reduction in value can be quantified and owners living adjacent to the development should be compensated. We appreciate this issue falls outside the present legislation, but it would do much to ensure compliant and happy neighbours to this long and difficult period of development. We have had our property adjacent to the development valued and it has lost considerable value since the development was publicized.

We are both supporters of this development as we believe it will benefit the Manawatu and Palmerston North substantially.

We believe that more detail is needed to understand how and when the development will proceed and that cooperation between PNCC, NZT and Kiwirail will ease the development and its impacts on the local community.

We believe that some effort by Kiwirail directed towards making the lives of those who are substantially affected by it but who live outside the land being used will go a long way to keeping the local community happy.

Kevin and Yvonne Stafford

684 Roberts Line

22-3-2021