

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 2

Continue on separate sheets if necessary

SUBMITTER DETAILS

Full name of Submitter Janet Susan Stirling

Postal Address 64 Wikiriwhi Crescent

Phone 0211274724

Palmerston North

Email susanstirling@gmail.com

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 designation of land to accommodate (construct and operate) a new intermodal rail and freight hub near Bunnythorpe.

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.)

I support the construction and operation of a new rail hub near Bunnythorpe as this will benefit the city of Palmerston North in terms of employment and business. Palmerston North is an ideal location for the distribution of goods in the lower North Island. It is excellent that the provinces are being recognised as somewhere that needs new infrastructure and development. The use of rail to transport good is a very positive move in reducing New Zealand's carbon footprint.

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)

I seek for the Palmerston North City Council to agree to the designation of land to accommodate the proposed construction and operation of a new intermodal rail and freight hub near Bunnythorpe.

4	DO YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION?
<input type="checkbox"/> YES	<input checked="" 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 type="checkbox"/> YES (If Yes, comment below)	<input checked="" type="checkbox"/> 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

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SUBMITTER DETAILS

Full name of Submitter Michael McCartney (CE), Horizons Regional Council (Horizons)

Postal Address Private Bag 11025, Palmerston North

Phone 06 9522 908

(Signed by Horizons CE on attached letter)

Email sarah.carswell@horizons.govt.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:

Refer to the submission letter attached.

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.)

Refer to the submission letter attached.

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Refer to the submission letter attached.

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25 March 2021

RAI 04 03
SC

Attn: Democracy and Governance Manager
Palmerston North City Council
Private Bag 11-034
Palmerston North

Email submission@pncc.govt.nz
Copy Pam.Butler@kiwirail.co.nz

Dear Democracy and Governance Manager

HORIZONS SUBMISSION ON A NOTICE OF REQUIREMENT FROM KIWIRAIL HOLDINGS LTD FOR A DESIGNATION FOR A REGIONAL FREIGHT HUB

1. Thank you for the opportunity to make a submission on the Notice of Requirement (NOR) from KiwiRail Holdings Ltd (KiwiRail) for a designation to replace its Palmerston North Freight yard with a new intermodal rail and freight facility, called a Regional Freight Hub.
2. Horizons Regional Council (Horizons) could not gain an advantage in trade competition through this submission.

Specific parts of the NOR that our Submission relates to:

3. Horizons' submission generally supports the decision being sought. We agree with the rationale for seeking to designate this area in order for KiwiRail to replace its existing Palmerston North Freight yard with a new future-proofed intermodal rail facility. Horizons wishes to provide advice in relation to Horizons One Plan, natural hazards, (including stormwater management), future consenting requirements, freshwater management, and transport priorities.
4. Horizons considers that the Freight Hub NOR assessments have a broad alignment with Horizons One Plan (combined Regional Policy Statement (RPS) and Regional Plan), the Regional Land Transport Plan, the draft Regional Land Transport Plan 2021-31, and Horizons Regional Public Transport Plan. However, this does not confirm support for any future regional consenting requirements which will be assessed on detailed design.
5. For this application Horizons has had, and continues to have, ongoing communication and engagement with KiwiRail, their agents and Palmerston North City Council (PNCC), in regards to river and flooding information, biodiversity, future consenting requirements and transport priorities. Horizons River Management team have provided relevant information on the streams and flooding. In regards to future consent requirements, Horizons staff have met remotely (via Zoom) with KiwiRail and its agents. Horizons staff attended the Multi Criteria Assessment (MCA) Workshop; Horizons Science team have provided advice on the Multi Criteria Assessment (MCA).

Horizons One Plan and Natural Hazards

6. The One Plan RPS sets the policy framework for the management of development and activities in the region. Specifically, these matters are addressed in below and in the following paragraphs and in the Transport Priorities section.
7. It is noted in the NOR application that One Plan Policy 9-2 (Development in areas prone to flooding) does not apply to new critical infrastructure. Please note that One Plan Objective 9-1, Policy 9-3 and Policy 9-4 do apply to the development of the Freight Hub.

Objective 9-1 of the One Plan sets the overarching approach for managing the effects of natural hazard events in the Region, as follows:

The adverse effects of natural hazard events on people, property, infrastructure and the wellbeing of communities are avoided or mitigated.

8. Policy 9-3 seeks to ensure that 'critical infrastructure' (which includes strategic road and train networks) is not disabled by natural hazard events, by avoiding the placement of critical infrastructure in areas prone to natural hazards. The policy recognises that in some cases this is unavoidable, for example roading and gas supplies in coastal areas regardless of tsunami risk. Policy 9-3 (New critical infrastructure) states that:

The placement of new critical infrastructure in an area likely to be inundated by a 0.5% AEP (1 in 200 year) flood event (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:

- (a) *will not be adversely affected by floodwaters or another type of natural hazard,*
- (b) *will not cause any adverse effects on the environment in the event of a flood or another type of natural hazard,*
- (c) *is unlikely to cause a significant increase in the scale or intensity of natural hazard events, and*
- (d) *cannot reasonably be located in an alternative location.*

9. Policy 9-4 (Other types of natural hazards) states that:

the Regional Council and Territorial Authorities must manage future development and activities in areas susceptible to natural hazard events (excluding flooding) in a manner which:

- (a) *Ensures that any increase in risk to human life, property or infrastructure from natural hazard events is avoided where practicable, or mitigated where the risk cannot be practicably avoided,*
- (b) *Is unlikely to reduce the effectiveness of existing works, structures, natural landforms or other measures which serve to mitigate the effects of natural hazard events, and*
- (c) *Is unlikely to cause a significant increase in the scale or intensity of natural hazard events.*

10. Horizons River Management team have provided KiwiRail with 1 in 200 year (0.5% Annual Exceedance Probability (AEP)) flood modelling information for this area. This site is within a floodplain of the Mangaone Stream catchment and as described in the NOR application; there is approximate 10 hectares of modelled flood depths within the Freight Hub site. KiwiRail will need to give effect to Policy 9-3 by avoiding the placement of critical infrastructure in areas prone to flooding or demonstrating that all four of the criteria set out in clauses (a)-(d) are met. Horizons has met and discussed stormwater at a high level; these discussion have been used

to inform the information provided as part of the NOR and inform an outline of the concept design. The development of the Freight Hub will require a number of consents from Horizons which will need a robust assessment of environmental effects. Without reviewing detailed proposals, Horizons River Management team cannot comment as to whether the technical work carried out to date will be enough to inform the assessment of environment effects. There may be impacts or issues relating to both flood and stormwater inundation that may arise through the detailed design / consenting process that have not yet been considered. As stated in the NOR application, "Stormwater system design will have detailed considerations of matters discussed and will be included within the detailed design and consenting stages." Horizons River Management team encourage KiwiRail and their agents to engage with Horizons early in the detailed design process to ensure that all issues are addressed. There will be more involvement from Horizons River Management team during the resource consenting process. If the panel needs more information about waterways and flooding, please contact [Horizons Coordinator District Advice](#).

11. GNS Science's regional scale information indicates that there are known active faults in the vicinity of this designation. The Pohangina Fault and the Pohangina Anticline are located to the south-east of the designation. The Taonui Fault, Rauoterangi Fault, Mount Stewart-Halcombe Fault and Feilding Anticline are located on the north-west of the designation. In 2018 Horizons commissioned GNS Science to complete mapping of faults within the Palmerston North City (including Horowhenua District). If you would like a copy of this report called 'Active Fault Mapping and Fault Avoidance Zones for Horowhenua District and Palmerston North City', (Report 2018/75, May 2019 FINAL), please contact [Horizons Coordination District Advice](#). This information at a regional scale can be accessed on the GNS Science's webpage: <http://data.gns.cri.nz/af/>. The Ministry for the Environment (MfE) has produced the following guidelines for active faults: <https://mfe.govt.nz/publications/rma/planning-development-land-or-close-active-faults-guideline-assist-resource-5>
[https://mfe.govt.nz/sites/default/files/media/RMA/planning-development-faults-graphics-dec04%20\(1\).pdf](https://mfe.govt.nz/sites/default/files/media/RMA/planning-development-faults-graphics-dec04%20(1).pdf)
12. GNS Science and PNCC have completed liquefaction susceptibility mapping for this area. As discussed in the NOR application, the 2011 GNS report indicates that elevated alluvial terrace deposits covering most of the site are likely to have negligible liquefaction induced damaging potential while the low lying geologically recent alluvial material will have a moderate to high liquefaction damage potential. KiwiRail will need to give effect to Policy 9-4 and manage the development and activities in these areas that are susceptible to liquefaction, including by avoiding where practicable any increase in risk to human life, property or infrastructure from the hazard. For example, changes have been made to the Building Code to require robust foundations for liquefaction prone ground. This change already exists in the Canterbury Region, and will be extended to all of New Zealand after 28 November 2021, ensuring new buildings are being built safely and strongly enough to withstand liquefaction risks. For more information on building on liquefaction prone ground: <https://www.building.govt.nz/building-code-compliance/geotechnical-education/ensuring-new-buildings-can-withstand-liquefaction-risks> For more information about planning and engineering guidance for potentially liquefaction prone land: <https://www.building.govt.nz/assets/Uploads/building-code-compliance/b-stability/b1-structure/planning-engineering-liquefaction.pdf>
13. If there are any questions about faults or liquefaction susceptibility please contact GNS Science.

Horizons One Plan and Future Consenting Requirements

14. The NOR assessment explains KiwiRail's approach of seeking the designation in advance of lodging the required regional consents. Confirmation of the final consenting requirements will need to be undertaken once detailed design of the project has been completed. An updated report and assessments of the effects will be required for that phase of the project. Once

further design details are confirmed, any resource consent requirements can be dealt with through Horizons Regulatory team. The various consenting requirements may include, but are not limited to: discharge to water, discharge to land, land disturbance (earthworks) and cleanfill, works in a waterbody. The support provided by this submission does not reflect any decision on the future consent process. The consent process will need further details and assessments to be undertaken and KiwiRail needs to be aware that separating out the two processes does introduce a risk to KiwiRail if anything needs to be altered once the detail is provided through the consent process. Any necessary resource consents will need to be obtained from Horizons prior to the construction of Freight Hub. The proposed conditions in Appendix 3 of the NOR include conditions for PNCC; please note that Horizons consent conditions will be different from PNCC's conditions. KiwiRail and their agents are strongly encouraged to continue to engage with the Horizons Regulatory team. For information on consents please contact the Regulatory team on Freephone 0508-800-800 or email consents.enquiries@horizons.govt.nz.

15. As described in the NOR there have been some aquatic and terrestrial ecological assessments completed. Horizons Science team suggest that the avoidance of areas of indigenous vegetation and reduction of effects on waterways will assist in reducing of the level of adverse effects to both terrestrial and aquatic ecosystems. The appropriateness and technical merit of any proposed remedies and mitigations for biodiversity effects will be assessed separately by Horizons Science team as part of the formal resource consenting process, once detailed design plans have been prepared showing the confirmed location and area of disturbance. It is anticipated that there will also be more involvement from the Horizons Science team during the consenting process which may include, but are not limited to: aquatic biodiversity, fish passage, stream diversions, water allocation, and water and stormwater quality.
16. Assessment of the Freight Hub development will need to be completed in relation to the National Policy Statement for Freshwater Management 2020 (NPS FM) and National Environmental Standards for Freshwater 2020 (NES FM). There are sections within NPS FM and NES FM that relate to loss of waterway / wetland extent or quality, and fish passage considerations around any proposed structure that could be an impediment to fish passage, for example culverts and stormwater detention dams. This is best considered early in the process as the consenting pathways for these have in some case become considerably more difficult, depending on what is proposed. The NPS FM have a wider definition of wetland than One Plan's regulatory framework. Putative wetland areas would need to be assessed against the NPSFM / NESFM definition in addition to the One Plan. KiwiRail will also need to consider managing freshwater and stormwater quality in terms of the NPS FM, including the effects on receiving environments. For more information please refer to Ministry for the Environment webpage: <https://www.mfe.govt.nz/fresh-water/npsfm/documents-incorporated-by-reference> or contact Horizons Senior Environmental Scientist Freshwater (email: Michael.Patterson@horizons.govt.nz or Freephone 0508-800-800).
17. In regards to One Plan Objective 3-1: Infrastructure and other physical resources of regional or national importance, please refer to Transport Priorities Section below.

Transport Priorities

18. The proposed designation of the Regional Freight Hub is strongly supported from a Horizons transport perspective.
19. Objective 3-1 of the RPS is

Have regard to the benefits of infrastructure and other physical resources of regional or national importance by recognising and providing for their establishment, operation, maintenance and upgrading.

This is supported through a suite of policies, notably Policies 3-2 and 3-3 of One Plan RPS, ensuring the protection from adverse effects from other activities on infrastructure recognised as regionally or nationally significant, and supporting this infrastructure's establishment, operation, maintenance and upgrading. While the Freight Hub is not yet recognised as nationally or regionally significant infrastructure through the methodology set out in Policy 3-1(a)(iv), designation of the site and existing roading networks within the proposed site is considered a sensible and appropriate mechanism to give effect to the intent of the RPS objective and policies in this space.

20. While not an activity that can be included in the Regional Land Transport work programme (given it is not funded by the National Land Transport Programme), the Freight Hub will play a vital role in achieving Horizons Regional Transport Committee's vision for *"a region that connects central New Zealand and supports safe, accessible, and sustainable transport options"* (Draft Regional Land Transport Plan (RLTP) 2021-31). The project meets all five of the proposed transport investment priorities for the region:
 1. Connectivity and access: provide better transport connections and options to enable efficient and safe movement of people and freight, and improved access to health, social and economic opportunities;
 2. Safety: improve the transport network to create a safe transport system for all users;
 3. Better travel options: make active and public transport, and alternative freight modes safe, attractive and viable options for more trips throughout the region;
 4. Environment: reduce environmental impacts and carbon emissions from the transport system; and
 5. Resilience: build resilience into the regions transport network by strengthening priority transport lifelines.
21. The Regional Freight Hub will assist with achieving the Regional Transport Committee's aspirations for land transport as set out in both the current and draft RLTPs.
22. Horizons Transport team notes the proposed conditions relating to development of the Road Network Integration Plan. The team acknowledge that until more detail is publicly released about the Regional Freight Ring Road, plans for efficient and safe connections to the road network cannot be determined. While not preferred, the use of such a condition in the absence of this detail is considered appropriate. With that said, Horizons strongly encourages ongoing engagement with key parties as both the Palmerston North Integrated Transport Improvements (PNITI) project and the Freight Hub project progress.
23. The Road Network Integration Plan should be regularly reviewed and updated throughout the design and construction phase (perhaps 3-6 monthly) to consider and incorporate any additional information available in relation to the roading network, active transport network, local industrial area vehicle movements and public transport services. Horizons requests that public transport services be referred to in Appendix C: Notice of Requirement conditions (updated S92) condition 46 (h).
24. As part of the regular review and update to the Transport Network Integration Plan (TNIP), consultation should occur with Horizons, PNCC and Waka Kotahi NZ Transport Agency (Waka Kotahi), and comment sought. This will ensure ongoing and open lines of communication between key parties which will assist with sharing of the most recent information available as various projects progress. Updated copies of the amended TNIP should be provided to Horizons, PNCC and Waka Kotahi within one month of completion.
25. Horizons Transport team have provided some other key points for consideration:
 - (a) Provision for multi-modal travel is important. Horizons notes the lines showing the Te Araroa Trail; however, we seek an assurance that any changes to the roading network will provide for safe cycling (through separation). Horizons also notes the shared

pathway currently under construction within the Manawātū District and proposed for the Palmerston North City section which will provide a link for cyclists, pedestrians and potentially micro-mobility (e-scooters etc.) between Feilding, Bunnythorpe and Palmerston North. It is unclear whether the proposal will impact on this facility. If information is available, we seek clarification on this matter. In the event that the shared pathway will be impacted by the proposal, we seek information on how this will be mitigated to ensure provision of safe access for pedestrians and cyclists between Feilding-Bunnythorpe-Palmerston North.

- (b) The proposal involves closing Railway Road. Horizons' operates a public bus service travelling between Feilding, Bunnythorpe and Palmerston North which travels via Railway Road. Early engagement surrounding closure of Railway Road will be critical to Horizons' planning for this service. We advise that a minimum of 12-18 months will be required to ensure Horizons are able to effectively plan for and consult on route and infrastructure changes for this bus service.
 - (c) The RLTP recognises improving connectivity as a strategic priority. Continued connectivity for Feilding and Bunnythorpe communities with Palmerston North is critical. These smaller communities rely on access to larger centres for access to healthcare, employment and education. For this reason, ensuring continued safe, efficient and reliable connections between these communities is vital.
26. For further information on the matters raised in relation to the Transport Priorities section of this submission, please contact the Transport team (email: transport@horizons.govt.nz or Freephone 0508-800-800) and ask to speak to the Transport Manager, Rhona Hewitt.

Closing Comment – Decision Sought

27. Horizons does not seek any specific changes to this NOR application. KiwiRail will need to continue to consult with Horizons during the detailed design preparation to ensure that the project has alignment with Horizons One Plan, the Regional Land Transport Plan, and the Regional Public Transport Plan. Any necessary resource consents will need to be obtained from Horizons prior to the construction of Freight Hub. Horizons Transport team strongly encourage ongoing engagement with themselves and key parties as the Freight Hub project progresses particularly for the Regional Freight Ring Road (PNITI). Horizons request that public transport services is referred to in the conditions. Horizons and other key parties should be consulted as part of Transport Network Integration Plan. Horizons Transport team have provided other key points for KiwiRail to consider, provide clarification and assurance. KiwiRail and their agents are strongly encouraged to continue to engage with the Horizons River Management, Regularly, Science and Transport teams early as the project progresses.
28. Horizons wishes to be heard in support of this submission. If others make a similar submission we will consider presenting a joint case with them at the hearing.
29. If the panel would like to discuss or clarify any aspect of this submission please contact Sarah Carswell (email: sarah.carswell@horizons.govt.nz or phone 06-9522-908).

Yours sincerely,



Michael McCartney
CHIEF EXECUTIVE

KIWI RAIL FREIGHT HUB SUBMISSION FORM



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SUBMITTER DETAILS

Full name of Submitter Ian Alexander Shaw
Postal Address 815 Roberts Wye Phone 021 221 7780
Palmerston North Email ianshaw888@gmail.com
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:

That I am concerned with the proposal to operate the Bunnythorpe freight hub especially the effect it will have on neighbouring properties such as noise, fumes, flood control & effect on property values.

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.)

I oppose all of the specific parts of the application especially in regard to noise, dust, flood control, landscape views & property devaluation. Breaches all land use rules in place for the area.

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)

I request that the council decline Kiwi rail requirements 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 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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☐ YES (if Yes, comment below) ☐ NO

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Limited for a designation to accommodate a new regional freight hub

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SUBMITTER DETAILS

Full name of Submitter **Fiona Hurly**

Postal Address **15 Kairanga Bunnythorpe Rd**

Phone **0211375998**

Email **a_straea@yahoo.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:

My submission relates to the freight hub's location in Bunnythorpe and the concerns I have regarding this.

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)**

I am opposed to having the freight hub being built in Bunnythorpe

We did not choose to live in an industrial area and do not want to - if the freight hub is to go ahead at Bunnythorpe then it will be forced upon us against our wishes, without our permission and have a detrimental effect on the quality of life.

There are the multiple pollution issues - there will be fumes, smoke, dust generated by the hub, gone will be the days of opening up the windows (as advised for healthy homes) to get fresh air & air the house out, there will be no space or place to get fresh

3

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

I request that the council reject Bunnythorpe as an area for the freight hub as it is an already established residential village with real people who will undoubtedly be affected by having something so massive (and there is no denying that the proposed freight hub is huge) as the freight hub forced upon them. When the housing crisis is such a major crisis, it's irresponsible and short sighted to be looking to take away residential housing and add to the housing crisis. As such I ask that the council find a more suitable location for the freight hub - an unpopulated area where people's lives and health won't be put at risk.

4	DO YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION?
<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
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<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 (see attached pages)
<input checked="" type="checkbox"/> YES (If Yes, comment below)	<input type="checkbox"/> NO

I am directly affected by all the effects stated, pollution, noise, light, vibration, flooding and all the health affects this will have. As noted, I already suffer from a long term (and debilitating) illness. Living in Bunnythorpe has given me the chance to be away from the effects of city pollution (noise, light & environmental) that I used to experience in



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

22 - Fiona Hurly (cont'd)

Q2. MY SUBMISSION IS:

I am opposed to having the freight hub being built in Bunnythorpe

We did not choose to live in an industrial area and do not want to - if the freight hub is to go ahead at Bunnythorpe then it will be forced upon us against our wishes, without our permission and have a detrimental effect on the quality of life.

There are the multiple pollution issues - there will be fumes, smoke, dust generated by the hub, gone will be the days of opening up the windows (as advised for healthy homes) to get fresh air & air the house out - there will be no escape or place to get fresh air which for someone already suffering from a long term illness will place further negative impacts on my health but also on the health of everyone in the area - there is a reason houses aren't built in industrial areas and the opposite should be true too - industrial areas shouldn't be built in residential areas. It's my understanding that Kiwirail recently purchased more diesel engines so the pollution from them is set to be a long term issue.

The housing crisis is another issue - at this time when there is such huge housing crisis it is immoral to begin projects that will exacerbate that crisis. If the hub goes ahead houses will be removed - meaning fewer houses when there are too few already and contributing further to the demand as those whose houses will be removed will have to join in everyone already seeking housing.

Traffic is another area of concern, there are already issues with the traffic around Bunnythorpe & there have been several traffic fatalities in the area - the hub will bring more traffic and contribute to a worsening traffic situation. Some of the "praise" for the idea of the hub is that it will take traffic out of Palmerston North but that is unfair to the people of Bunnythorpe, it is not solving any traffic issues, rather will result in more.

Vibration issues are another concern, as it already is, when trains go past we can feel the vibrations and some of the heavier ones cause shaking of objects in the house but that is only fleeting until the train passes there will be no such relief with the hub, there will be continual vibrations day & night which will severely impact people's health

<https://bmjopen.bmj.com/content/bmjopen/3/5/e002655.full.pdf>

22 - Fiona Hurly (cont'd)

Noise is another issue. Again we already experience some noise when trains go past but they keep going not so with the hub. AS I suffer from a long term illness with for the most part means I'm housebound, if the hub goes ahead in Bunnythorpe I will be one of the ones most affected as I'll be stuck at home with it all the time with no escape. This is further exacerbated by, as part of my illness, suffering from noise sensitivity. There have been many studies done of the impacts of noise on health. here are just a few

- Impacts of Transport on Health – An Overview – A summary prepared by the Public Health Advisory Committee, April 2003

(<http://www.nhc.govt.nz/PHAC/publications/SummaryofTransport&HealthPartners.pdf>)

- The health effects of environmental noise – other than hearing loss – a summary prepared by The enHealth Council, a subcommittee of the Australian National Public Health Partnership, May 2004

- The influence of night-time noise on sleep and health, Health Council of the Netherlands, 2004

- Health aspects of extra-aural noise research. Wolfgang Babish. Noise and Health Journal 2004

- Updated review of the relationship between transportation noise and cardiovascular risk. Wolfgang Babisch, 2005. Proceedings of 12th ICSV, Lisbon

Light issues and pollution are another concern - having a continual artificial light source going all the time is again detrimental to people's health. An area that again has been much researched - this literature review gives some of the research <https://pubmed.ncbi.nlm.nih.gov/26375320/>

Sleep disturbance as a result from the noise, light, pollution and vibrations are all very real concerns and again the importance of sleep for people's health has been well researched as has the negative health outcomes from not getting the sleep. Here's just one such example <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4608916/>

There is no doubt in my mind that the freight hub will result in sleep disturbances for people in Bunnythorpe, should it be given the go ahead. '

22 - Fiona Hurly (cont'd)

Another area of concern is flooding - shortly after we moved to Bunnythorpe we experienced heavy rains which led to sewerage overflow into our property an issue which happened multiple times before a solution to our single house was found. The same issue has been experienced by others in our street and the street itself has been flooded. we've been told it is because of issues with storm water getting into the sewerage system an issue that is apparently no quick fix and will take a lot of work and investigation to remedy. So it is of great concern that is the pipes around Bunnythorpe have trouble coping on occasion with just the Bunnythorpe area - then how will they possibly cope with the added pressure of something so massive as the freight hub. Also as to general flooding, there are parts of people's properties that they are not allowed to build on (can't get consent) because of the risk of flooding - yet suddenly it's ok for something so massive as the freight hub to be built in the same area. And if it is built, the measures taken to protect it from flooding could well the cause a worsening of flooding to surrounding areas which will not benefit from any anti flood measures.

I also have concerns, should the hub go ahead, about the construction process itself and all the noise, pollution, vibration, road works and traffic that it would involve - again as someone who is home most of the time, there will be no escaping the chaos and I worry for the effects this will have on me personally given the health issues I already struggle with as well as for my neighbours and what health issues they may struggle with and develop as a result of such a huge project being forced upon us - should it go ahead.

I'm also concerned about the environment - the hub is set to take up a massive amount of land which will be cleared and as such remove trees and the green area that is needed to ensure a healthy environment. Also given the flood risk in the area, tree removal is not a good idea as trees can reduce or even stop flooding. We should be planting more trees - not removing the ones that are already established. Also what ecosystems will be damaged as a result? There are many environmental factors to consider and the damage that can be done won't be able to be undone.

22 - Fiona Hurly (cont'd)**Q3: I SEEK THE FOLLOWING RECOMMENDATION OR DECISION FROM THE PALMERSTON NORTH CITY COUNCIL:**

I request that the council reject Bunnythorpe as an area for the freight hub as it is an already established residential village with real people who will undoubtedly be affected by having something so massive (and there is no denying that the proposed freight hub is huge) as the freight hub forced upon them. When the housing crisis is such a major crisis, it's irresponsible and short sighted to be looking to take away residential housing and add to the housing crisis. As such I ask that the council find a more suitable location for the freight hub - an unpopulated area where people's lives and health won't be put at risk. I request that the decision for the location be made by unbiased parties who have no vested interest in the outcome, so not Kiwirail or the Palmerston North city council.

There is the feeling in Bunnythorpe that the council does not always do right by Bunnythorpe - in fact when hearing of the plans for the freight hub to placed here the response was "the council has shafted Bunnythorpe again" so again I ask that the decision be made by an unbiased party.

If despite objections, the freight hub goes ahead, then I ask that all affected parties be fully compensated for the effects that they will undoubtedly suffer. Such as having all medical expenses paid. And paying to mitigate the noise, pollution, light and vibration effects. Since the hub, should it go ahead, is being forced onto residents then I ask that the council offers to buy out (at market value) all those residents that would rather leave than be subjected to the effects of being forced to live next to giant freight hub that they never agreed to in the first place.

Q6B: I AM DIRECTLY AFFECTED BY AN EFFECT OF THE SUBJECT MATTER OF THE SUBMISSION THAT:

I am directly affected by all the effects stated, pollution, noise, light, vibration, flooding and all the health affects this will have. As noted, I already suffer from a long term (and debilitating) illness. Living in Bunnythorpe has given me the chance to be away from the effects of city pollution (noise, light & environmental) that I used to experience in Palmerston North so should the rail hub be placed in our area, I will be greatly affected by all the effects, this will be much worse than living in town.