

KIWI RAIL FREIGHT HUB SUBMISSION FORM

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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 **Raewyn Margaret Eastwood**

Postal Address **405 Tutaki Road, RD10,**

Phone **021 021 223 23**

Palmerston North

Email **raewyn.stuart@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:

Concerned about the proposed location of the freight hub.

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**

Opposed to the proposed location for the following reasons - related to our personal situation but will apply to all surrounding homes:

1. Noise - will be excessive and ruin the quality to life we have chosen by moving to the country. Eating outdoors (patio barbecue area) will not be enjoyable. Early mornings and evenings will not be peaceful.

2. Light - the height of the light towers will make it difficult to sleep at nights. Will also increase the risk of theft as the surrounding area will be more visible at nighttimes

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)

Request that Council declines KiwiRail's requirement for designation for the freight hub at the proposed location.

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

(Raewyn M Eastwood)

2. MY SUBMISSION IS:

Opposed to the proposed location for the following reasons - related to our personal situation but will apply to all surrounding homes:

1. Noise - will be excessive and ruin the quality to life we have chosen by moving to the country. Eating outdoors (patio barbecue area) will not be enjoyable. Early mornings and evenings will not be peaceful.
2. Light - the height of the light towers will make it difficult to sleep at nights. Will also increase the risk of theft as the surrounding area will be more visible at nighttime
3. Dust - carried by the wind, especially from the log yard (we are downwind of the predominant wind), will coat our property impacting on washing, respiratory quality, and taint water collection from the roof.
4. Operating hours - potential of long operating hours will only compound the effects listed above.
5. Property value - all of the above will reduce the value of the surrounding properties of which there are many. As New Zealanders typically have most of their net wealth held within their property, this will have significant impact on their ability to retire or quality of their retirement. For some people at their time of life this will be unrecoverable turn of fate.

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NUMBER OF PAGES

Form + 3 pages

Continue on separate sheets if necessary

SUBMITTER DETAILS

Full name of Submitter **Airways Corporation**

Postal Address

Phone **+64 (21) 860192**

50 Tacy Street, Kilbirnie, Wellington 6022

Email **michael.connolly@airways.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:

see attached

The proximity of the proposed site to the Palmerston North Airport (PNA) and any adverse effects on Airways' provision of Air Traffic Control (ATC) services, including but not limited to the lighting design.

The proposed site is near to PNA navigation lights, Airways' ATC Tower and other communications assets. Light and glare emitted from the rail hub could cause pilots and Air Traffic Controllers visibility/identification/perception issues, particularly in certain

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.)

Neutral, on the condition that there are no adverse effects on Airways' provision of Air Traffic Control services, and Civil Aviation Rules Part 77 (CAR Part 77 - Objects and Activities Affecting Navigable Airspace) is complied with.

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)

Airways seeks consultation with KiwiRail and the PNCC to ensure that there are no adverse effects on Airway's provision of Air Traffic Control services and that CAR Part 77 is complied with, so aircraft can continue to operate safely in and around the PNA. Further, expert opinion should be sought to assist with assessing how the proposed design will affect Air Traffic Control services and how any adverse effects can be mitigated.

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**

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EMAILING TO	submission@pncc.govt.nz
YOU MUST SERVE A COPY OF YOUR SUBMISSION ON KIWI RAIL 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 to be made on behalf of Airways Corporation of New Zealand Limited

1. The specific parts of the NoR my submission relates to are:

The proximity of the proposed site to the Palmerston North Airport (PNA) and any adverse effects on Airways' provision of Air Traffic Control (ATC) services, including but not limited to the lighting design.

The proposed site is near to PNA navigation lights, Airways' ATC tower and other navigation/communications assets. Light and glare emitted from the rail hub could cause pilots and Air Traffic Controllers visibility/identification/perception issues, particularly in certain weather conditions. Examples of potential lighting/glare issues are provided on the next page.

Further, the proposed development may lead to projections into the Airport Obstacle Limitation Surfaces (OLS). Refer Example 3 over page for details.

2. My submission is:

Neutral, on the condition that there are no adverse effects on Airways' provision of Air Traffic Control services, and Civil Aviation Rules Part 77 (CAR Part 77 - Objects and Activities Affecting Navigable Airspace) is complied with.

3. I seek the following recommendation or decision from the PNCC:

Airways seeks consultation with KiwiRail and the PNCC to ensure that there are no adverse effects on Airways' provision of Air Traffic Control services and that CAR Part 77 is complied with, so aircraft can continue to operate safely in and around the PNA. Further, expert opinion should be sought to assist with assessing how the proposed design will affect Air Traffic Control services and how any adverse effects can be mitigated.

Examples:

1. Construction: Roof glare.

The proposed site of the rail hub is to the north of the Air Traffic Control Tower and aligns with a number of aircraft tracks and reporting points for aircraft coming into Palmerston North Airport. This means there is potential for the glare from the Rail Freight Hub roof/cladding to negatively impact on aircraft safety by introducing a sun-strike risk for pilots and Air Traffic Controllers (ATC). This will most likely occur on sunny days, particularly in winter months when the sun travels lower in the northern sky.

To expand, the proposed site of the rail hub is directly below the track which Instrument Flight Rule (IFR) aircraft arrivals from the north follow when conducting a Visual Approach to Runway 25. The proposed site location is also bracketed closely on either side by two of Visual Reporting Points and a number of other arrival/departure tracks for Visual Flight Rule aircraft.

2. Lighting: Night Lighting

If unshielded or directional lighting is used, the lights at the proposed rail hub may produce significant glare at night into the Controller's sightline to the north-north-east on and just above the runway. This may introduce a risk for aircraft identification at night.

In order to mitigate this risk, the lights would need to have covers/shields orientated at an angle that protects the south-south-west, and the height of the light poles would need to be as low as is practicable. In addition, careful checks will be required on the top of Rail Freight Hub site compared to the Tower/Airfield ground height.

3. Obstacle Limitation Surfaces – any projections into the airspace around an airport which in some directions can extend upto 4km from the airport.

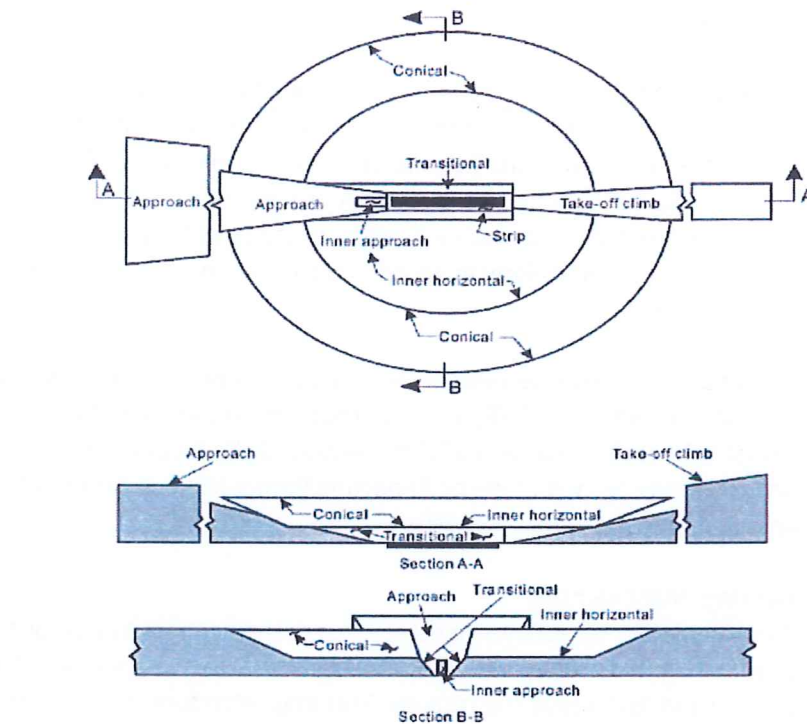


Figure 4-2 Obstacle limitation surfaces

Advisory Circular

AC139-6

Revision 5

Table 4-1. Dimensions and slopes of obstacle limitation surfaces

Approach Runways

	Non-instrument				Non-precision approach			Precision approach category		
								I	II or III	
	Code Number				Code number			Code number	Code number	Code number
Surface and dimensions	1	2	3	4	1,2	3	4	1,2	3,4	3,4
CONICAL										
Slope	1:20	1:20	1:20	1:20	1:20	1:20	1:20	1:20	1:20	1:20
Height above aerodrome	150 m	150 m	150 m	150 m	150 m	150 m	150 m	150 m	150 m	150 m
INNER HORIZONTAL										
Height above aerodrome	45 m	45 m	45 m	45 m	45 m	45 m	45 m	45 m	45 m	45 m
Locus from strip edge	2000 m	2500 m	4000 m	4000 m	2500 m	4000 m	4000 m	3500 m	4000 m	4000 m
INNER APPROACH										
Width	—	—	—	—	—	—	—	90 m	120 m ¹	120 m ¹
Distance from threshold	—	—	—	—	—	—	—	60 m	60 m	60 m
Length	—	—	—	—	—	—	—	900 m	900 m	900 m
Slope	—	—	—	—	—	—	—	1:40	1:50	1:50

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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

1

Continue on separate sheets if necessary

SUBMITTER DETAILS

Full name of Submitter **Michael Sharp**

Postal Address **2A/28 Wellesley St East, Auckland 1010**

Phone **0211533869**

Email **mjasharp@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:

I would like to indicate my overall support that the designation is approved.

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 overall proposal for the proposed rail freight hub, and as such I support the implementation of the designation sought by KiwiRail. This is infrastructure which will have effects on the rest of the North Island and the country - reducing driven kms of trucks everywhere as freight begins to switch to rail. This will help the country meet it's climate obligations, improve safety for other road users, prolong the longevity of urban streets and rural highways, and improve supply chain resilience, all while encouraging economic development outside of the main

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 PNCC approves the required designations and any consents needed to progress the regional freight hub, and is supportive of operation of 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:**

- 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**

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

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25 March 2021

Attn: Democracy and Governance Management
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 Management

ACCELERATE 25 SUBMISSION ON A NOTICE OF REQUIREMENT FROM KIWIRAIL HOLDINGS LTD FOR A DESIGNATION FOR A REGIONAL FREIGHT HUB

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.

Accelerate 25 (www.accelerate25.co.nz) is the Manawatu - Whanganui regional growth programme. It is a region wide collaboration, governed by the A25 lead team made up of Local Government, Central Government Business and Iwi (www.accelerate25.co.nz/lead-team.html)

A25 works to regionally identify, connect, facilitate and support major regional initiatives and opportunities. We submit on this basis of Transport and Distribution being a regional priority as designated in the Manawatu Whanganui economic action plan (www.accelerate25.co.nz/action-plan.html). To support this critical sector, Accelerate 25 facilitates and supports the Accessing Central NZ project team. This team works across the wider Manawatu -Whanganui region to support specific initiatives and ensure regional activity and investment are optimised.

Key points

1. The Kiwirail regional freight hub development is a critical component of the wider regional freight movement and distribution network. This network also plays a vital part in the New Zealand distribution chain. Accelerate 25 endorses this development in full.
2. Accessing Central NZ works across the region and has identified the key regional transport infrastructure projects displayed in this digital platform (<https://experience.arcgis.com/experience/5e9ce81fdc2a4e73bdbacf57929fbd2b>)
The project team works hard to ensure synergy is maximised through investment, timing and operational connection
3. A25 acknowledges the important leadership of Palmerston North City Council in developing the overall environment and actively seeks to support their efforts for the good of the city and region.

4. The economic benefits will come from highly effective and efficient distribution. This leads to an increased investment and growth of existing Central New Zealand industry with a strong attraction model for new investment in distribution, processing and manufacturing of our raw products and materials.
5. A25 views this as a 'one in a hundred year' opportunity for Central NZ, and as such strongly support the fully integrated development approach of key stakeholders including PNCC, NZTA, Kiwirail, Iwi, CEDA and industry.
6. A25 is happy to explain these points in more detail to the panel as required.

Yours sincerely



Craig Nash
Programme Director
ACCELERATE▶25

Email: craig@spearhead.nz

KIWIRAIL FREIGHT HUB SUBMISSION FORM

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Form 21 – Submission on a Notice of requirement from KiwiRail Holdings
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TO: Palmerston North City Council
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ATTENTION: Democracy & Governance Manager

NUMBER OF PAGES

7

Continue on separate sheets if necessary

SUBMITTER DETAILS

Full name of Submitter John David Bryan Austin & Rosaleen Mary Wapp

Postal Address 41B Clevely Line, RD8

Phone 06 3292563

Palmerston North 4478

Email dblondini@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:

Construction Noise & Vibration Management.
Landscape Plan. Operation Noise & Vibration Plan. Log Handling.
Bulk liquid storage.
Lighting Plan & Management. Heavy Vehicle movements onto Sangsters Rd.
Water Supply. Re zoning from Rural to Industrial.
Earthworks. Social and economical impact. (full discription in attached RFP)

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 oppose the RFH proposal and outline specifics with mitigations/solutions following this form. (full discription in attached RFP).

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)

A triple glazing settlement package to our house windows to mitigate noise. A blackout blind settlement to the windows of our house to mitigate light polution. An upgrade to water supply so we do not rely on tank water colected from our roof, directly down wind of the RFH including a water filter system to protect against contaminates during contruction. Make available top soil strip and hard strip from geographical scappings of RFH site to landscape our property to draw the attention away from an unsightly industrial RFH directly across the road from our front lawn. Wooden rail sleepers for

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

As we live directly down wind (prevailing westerly quarter) of the proposed RFH, within 200m, we will be directly, physically and mentally, affected by construction and operational noise. We will be directly, physically and mentally, effected by construction and operational vibration. We will be directly effected both physically and mentally by operational light. We will be directly effected by road changes. We will be directly

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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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(John D B Austin & Rosaleen M Wapp)

3. I SEEK THE FOLLOWING RECOMMENDATION OR DECISION FROM THE PALMERSTON NORTH CITY COUNCIL:

A triple glazing settlement package to our house windows to mitigate noise. A blackout blind settlement to the windows of our house to mitigate light pollution. An upgrade to water supply so we do not rely on tank water collected from our roof, directly down wind of the RFH including a water filter system to protect against contaminants during construction. Make available top soil strip and hard strip from geographical scappings of RFH site to landscape our property to draw the attention away from an unsightly industrial RFH directly across the road from our front lawn. Wooden rail sleepers for landscaping for building of a retaining wall for our garden. (Full description in attached RFP)

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

As we live directly down wind (prevailing westerly quarter) of the proposed RFH, within 200m, we will be directly, physically and mentally, affected by construction and operational noise. We will be directly, physically and mentally, effected by construction and operational vibration. We will be directly effected both physically and mentally by operational light. We will be directly effected by road changes. We will be directly, physically and mantally, effected by construction and operational pollutants (dust, diesel fumes, Radio transmissions). Our sleep patterns will be directly effected by 24hr rail operations. (full discription in attached FRP)

26 March, 2021 Palmerston North City Council, Private Bag 11-034, Palmerston North 4410

ATTENTION: Democracy & Governance Manager

In relation to Form 21 – Submission on a notice of requirement from KiwiRail Holdings Ltd for a designation to accommodate a new regional freight hub

Submitter Details:

John David Bryan (Dave) Austin & Rosaleen Mary (Rose)Wapp
41B Clevely Line, RD8 Palmerston North 4478

1. Volume one: Appendix 3, #9

Dust and Air Quality Effects (AEE, Sections 9.2.3.2 and 9.13)

1.1 Construction Noise & Vibration Management Plan

As disclosed in Volume one: Appendix 3, we could not find in any of the following volumes mention of the Construction Noise & Vibration Management Plan. This concerns us as the management of construction pollutants, i.e Noise, dust & vibration, has not been adequately addressed. We could not find an assessment by Stephen Chiles or Michael Smith for the effect of construction on residents, namely ourselves, directly down wind of the proposed site, #3.

Issue with Dust and Air Quality Effects during construction of the Hub - the prevailing winds is (westerly quarter) which will affect all properties including ours (41A&B Clevely Line, Bunnythorpe) to the east of the proposed Hub. These properties collect rainwater for drinking.

Therefore, I'm opposed to the construction of the site at option #3 because of the lack of information around noise, vibration and pollutants or the lack of a timeline for these adverse effects during construction.

Migration/Solution:

To address Construction Noise and Vibration

1. A triple glazing package for our house at 41B Clevely Line.

To address Construction Air Quality effects

1. KiwiRail provides (funded) high-quality water filter system for these homes.
2. Upgrade of town supply water.
3. Early planting (before construction starts ie as soon as approval to commence) of trees between Hub and residents along the existing berm either side of the existing rail track to lessen the effect of dust disbursement. **Early planting allows maximum growth before construction begins, lessening the effects of contamination of drinking water.**
4. Erect a cloth to catch the dust acting as an air filter
5. Soil and earth damping during earth movements to ensure better air quality
6. Move site to option 1 or 2

Volume one: Appendix 3, #9d

1.2 Landscape Plan: Cross Section 9

I support the implementation of the proposed noise mitigation wall at a minimum of 5 metres. This must be constructed prior to Hub Construction to help mitigate construction noise!

I support the planting of NATIVE trees and shrubs between the 5m Noise Mitigation Wall and Sangsters Rd. This is a wonderful opportunity for KiwiRail to partake in enhancing New Zealand's environment. Not only do I support the Tall River Plains Planting but feel it is essential for mitigating the adverse effects of Hub Construction.

To support solution

Planting must be implemented long before construction to the Hub starts to give the plants time to get established enough to act as mitigation.

Early planting (before construction starts ie as soon as approval to commence) of trees between Hub and residents along the existing berm either side of the existing rail track. **Early planting allows maximum growth before construction begins.**

Volume one: Appendix 3, #9i

1.3 Operation Noise & Vibration Management:

The comparative impact assessment (Appendix -f5, #4.) on site option 3 as presented by Stephen Chiles and Michael Smith state impact on residents as scoring 4, Medium High. I oppose the noise mitigation as being substantial enough! Not due to the assessed decibel rate, but due to the frequency (24/7 operation) of sound waves and vibration waves on the body, not just the sense of hearing! Public Health Research was conducted on the increased numbers of freight trains during the night having adverse effects on sleep structure and cardiovascular disease conducted by Dr Iona Croy, Michael G Smith and Kerstin Persson Wayne. Their findings state an increased heart rate due to train noise and vibration.

Migration/Solution:

1. Increased period of noise (nighttime operations of RFH) is for KiwiRail to offer a **triple glazing package** for our home at 41B Clevely Line.
2. Early planting (before construction starts ie as soon as approval to commence) of trees between Hub and residents along the existing berm either side of the existing rail track to lessen the effect of noise. **Early planting allows maximum growth before construction begins, lessening the effects of construction and operational noise.**
3. To mitigate vibration and noise, move site to Option 1 or 2 where a lower impact score has been recognised by Stephen Chiles and Michael Smith.

Additional Noise and Vibration

New proposed HV road into Hub on the east side will substantially increase (by 25% of all HV traffic) noise and vibration that does not exist to the same level now. This will have an emotional and mental health effect on the residents that are most affected by the proposal. This will also have a negative safety effort on families and children in this area that use the currents roads for exercise and recreational activities.

Effects on Te Araroa trail, the safety and experience of the Te Araroa trailers will not induce a pleasant and share outcome for our Bunnythorpe region. This could reduce the numbers using this track.

The new increased HV activity will have a stronger detrimental affect than the trains or the Hub as Hub will have a pattern and strong management, however HV vehicle will not have management therefore will speed, use airbrakes and create noise disturbance.



Migration/Solution:

1. All Eastern HV traffic is diverted to the northern or southern side of the Hub and do not enter the Hub in section 9 or anywhere along the existing Railway road area.

2. attachment-14-s92-q1-88-response-updated-rail-yard-concept-plan

2.1 Log Handling

The proposed log handling area as set out on attachment -14 S92 Q188 Response: Updated Rail Yard Concept Plan, is directly up wind (prevailing quarter) of our home and business.

I'm opposed to these operations as they introduce pests that will adversely affect our income source by introducing wood boring insects.

Forestry operations and log movements also spread noxious plants like Gorse. My partner and I have undertaken an extensive planting program on our property to enhance New Zealand native flora and fauna and at the time of writing we are enjoying an increase in New Zealand Native bird life. This population growth must continue and be preserved in these RURAL SITES. Vermin control is also paramount, and we undertake control measures at 41B Clevely Line.

Large scale industrial sites like the RFH are notorious for harbouring vermin that is averse to New Zealand Native Flora and Fauna!

Migration/Solution:

1. Regular and ongoing pest and vermin control must be carried out by KiwiRail within and along the perimeter, inside and out, of the RFH. Any increase in vermin activity must be dealt with swiftly by KiwiRail in accordance with DoC guidelines and community support.

3. Bulk liquid storage/Tank Storage.

I could not find in any of the appendices, details of what liquids or chemicals could or would be stored in tanks directly up wind of our property, 41B Clevely Line.

I'm strongly opposed to liquid/chemical storage so close to our home, especially, but not withstanding the fact the contents are not disclosed!

Migration/Solution:

1. Disclose to residents and council all liquid and/or chemicals stored in tank farm. Take necessary protective action to protect us and close residents from any and all harm from chemicals on site!

4. F-10 mca visual landscape assessment

Also, Lighting Plan and Management. Attachment 4A & 4B.

Refer attachment -4b-updated- lighting-report-track-changes.pdf -4.6.2 Glare Calculations.

We oppose the RFH lighting plan as it does not comply with the amount of Glare light pollution on our home, 41B Clevely Line (refer Glare Calculation Results – North East Properties. This graph states 41B Clevely Line reading for glare as 2.295, which fails to comply.

This degree of light pollution, indeed any industrial light pollution, in our Rural Lifestyle residence with have a large adverse effect on our quality of life. We are used to dark night-time environments for sleeping and ANY introduced, industrial lighting will destroy our rural lifestyle

Migration/Solution:

1. Establish a lighting plan that complies with the 1 lux maximum Spill and Glare to residential walls containing windows.
2. Kiwirail to supply mitigation package to reduce light pollution into our house at 41B Clevely line. Including triple glazing with bronze tinted glass. Custom made Black out curtains.
3. Compensation for loss of pollution free night sky. This to include financial compensation to aid in landscaping of grounds to block light pollution.
4. Early planting (before construction starts ie as soon as approval to commence) of trees between Hub and residents along the existing berm either side fo the existing track to lessen the effect of light spill and sky illumination. **Early planting allows maximum growth before lighting erected.**
5. Move RFH to site option 1 or 2.

5. Heavy Vehicle movements onto Sangsters Rd. (Volume one: Appendix 3, #9i)

In addition to the Notice of requirement from Kiwirail for a designation to accommodate a new intermodal rail and freight hub, should the RFH go ahead, we would like assurance that Kiwirail will engage in continued future development of Te Araroa walk way and green belt planting of Kiwirail trackside ground in and around the Bunnythorpe Community. Unfortunately, trackside land throughout New Zealand has been and continues to be notoriously unkept. Containing Blackberry, Gorse and other unsightly noxious weeds.

6. Social and Financial business impact

6.1 Custom Cabinetry Ltd

Currently Custom Cabinetry Ltd has roadside marketing signage at the north western corner of 41B Clevely line which has frequent passers by noting our business details. If the RFH goes ahead this signage will have reduced impact.

Migration/Solution:

1. Kiwirail to compensate Custom Cabinetry Ltd with additional signage, like for like, on a new main arterial road between Feilding and Palmerston North.

6.2 Change from Rural Zone lifestyle.

We are opposed to any change in Zoning from Rural to industrial or otherwise! We have moved to a Rural zone by purpose as we originate from Rural upbringing and enjoy the lifestyle it offers.

Migration/Solution:

1. The residential area East of the new rail track to maintain its current zone classification.

6.3 Loss Mental Wellbeing

Due to sleep loss and continuous pattern of noise and vibration effect on body and mind that **will** impact/happen to us at 41B Clevely Line should the RFH be constructed and operated at site option 3, and with no management plan by Kiwirail to mitigate the mental impact on us for the loss of Rural environment and quiet lifestyle we have currently.

- We will lose the current dark nights!
- We may lose investment growth.
- We may lose water collection quality.
- We will be affected daily (for years) by construction and operation by noise and dust blowing downwind (prevailing westerly quarter) onto our home.
- We have lost quality of mental health to date due to stress and anxiety since the location of the RFH was announced by Shane Jones on July 2, 2020.

Migration/Solution:

1. We would like to see Kiwirail implement continued and ongoing support initiatives for our short- and long-term overall health.

Planting of Bund and Green belt.

Planting of Earth Bund must be beneficial to New Zealand Native Flora and Fauna.

**SUBMISSION ON A NOTICE OF REQUIREMENT FROM KIWI RAIL HOLDINGS
LIMITED FOR A DESIGNATION TO ACCOMMODATE A NEW REGIONAL FREIGHT
HUB**

Form 21, Resource Management Act 1991

To: Palmerston North City Council ('Council')

Private Bag 11 034
Palmerston North 4410
Attn: Democracy & Governance Manager
via email: submissions@pncc.govt.nz

Submitter: Foodstuffs North Island ('Submitter')

1.0 SCOPE OF SUBMISSION

- 1.1 Foodstuffs North Island (FSNI) own and operate the site located at 703 Roberts Line (Lot 1 DP 384898). From this site, Foodstuffs operate a distribution centre which services the central and lower North Island in terms of deliveries of stock and produce to Foodstuffs operated supermarkets, being Pak N Save, New World and 4 Square. At its peak, 80 – 120 truck movements occur to/from the site in a 24-hour period
- 1.2 At present, all vehicular access/egress to the site occurs from Roberts Line although the site also has frontage to Richardson Line.
- 1.3 Being an immediately adjoining landowner to the Notice of Requirement (NoR), the main issue of contention for FSNI is that the works/activities proposed as part of the NoR do not create issues whereby the fundamental operation of the distribution centre (being the movement of stock to and from the site) is in any way restricted.

2.0 REASONS FOR SUBMISSION

- 2.1 The Submitter opposes in part the notice of requirement because it:
- (a) will not promote sustainable management of resources, will not achieve the purpose of the RMA and are contrary to Part 2 and other provisions of the RMA;
 - (b) will not enable the social and economic well-being of the community in the Palmerston North; and
 - (c) will not meet the reasonably foreseeable needs of future generations.
- 2.2 Without limiting the generality of paragraphs 2.1, further specific reasons for the Submitters' submission are set out in the 3.0 below.

3.0 RELIEF SOUGHT

3.1 The Submitter seeks that the NoR is declined unless sufficient clarification can be provided from Kiwi Rail on the following points:

(a) Changes to the roading network are proposed for Railway Road, Richardsons Line and Roberts Line. The proposed NoR does not convey sufficient information that would provide comfort to FSNI that the works will improve roading conditions in the vicinity of the FSNI site. In particular, FSNI seek confirmation that:

- i. Two-way traffic flow will continue uninterrupted on Roberts Line, Richardsons Line and the southern portion of Railway Road past the Roberts Line intersection;
- ii. Existing entry/exit points to/from FSNI site are not restricted in any way;
- iii. Changes to Railway Rd will not impact on traffic gaining access/egress to the FSNI distribution centre; and
- iv. Opportunities for access/egress to/from other parts of the FSNI site will not be restricted/limited as part of the proposed NoR.

(b) The development of the Kiwi Rail siding will have significant impacts on the wider road network through road changes (removal of roads and longer routes). Additional traffic on the network as the result of the Kiwi Rail facility does not appear to have been considered and thus mitigated.

(c) Two portions of land owned by Foodstuffs North Island are intended to be designated for road improvements. One at the corner of Railway Rd and Roberts Line, the other at the corner of Richardsons/Roberts Line.

- i. At a macro level, the NoR application material does not contain sufficient information to confirm that these portions of land are needed for the roading network to operate in an efficient manner;
- ii. At a micro level, the exact dimensions and extent of the proposed land takes are required to allow FSNI the ability to determine any impacts on their site; and
- iii. To date there has been no communication with FSNI in relation to any compensation being offered for the proposed land takes.

3.2 FSNI observe that the KiwiRail proposition is more than just a rail siding by inclusion of a commercial/industrial park. Whilst such a proposition does not directly affect FSNI, FSNI question if such commercial activities fall within the scope of the Kiwi Rail designation and whether those activities give rise to effects (such as traffic) that could be assessed through a plan change or resource consent process.

- 3.3 The Submitter could not gain an advantage in trade competition through this submission.
- 3.4 The Submitter wishes to be heard in support of its submission.
- 3.5 If others make a similar submission, the Submitter will consider presenting a joint case with them at the hearing.



Shannon Fallon, Barker & Associates on behalf of:

Brady Nixon
Development Manager, M&P
Foodstuffs North Island
(as person authorised to sign on behalf of the Submitter)

DATE: 26 March 2021

Address for Service: Foodstuffs North Island Limited
Attention: Brady Nixon
c/- Barker & Associates Limited
PO Box 1986
Shortland Street
Auckland Central 1140
Attn: Matt Norwell
Ph: 09 375 0900
Email: mattn@barker.co.nz

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Shannon Fallon, Barker & Associates on behalf of:

Brady Nixon
Development Manager, M&P
Foodstuffs North Island
(as person authorised to sign on behalf of the Submitter)

DATE: 26 March 2021

Address for Service: Foodstuffs North Island Limited
Attention: Brady Nixon
c/- Barker & Associates Limited
PO Box 1986
Shortland Street
Auckland Central 1140
Attn: Matt Norwell
Ph: 09 375 0900
Email: mattn@barker.co.nz

KIWI RAIL FREIGHT HUB SUBMISSION FORM

59 - 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

7

Continue on separate sheets if necessary

SUBMITTER DETAILS

Full name of Submitter Joanne Kathrine Whittle

Postal Address 10 Kairanga-Bunnythorpe Road

Phone 0210617810

RD 8, Palmerston North

Email J.Whittle@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:

The designation in the Palmerston North City Council District Plan relating to the construction and operation of a new intermodal rail and freight hub on land between Palmerston North and Bunnythorpe ("Freight Hub"), as outlined in the Notice of Requirement by KiwiRail Holdings Ltd. See the attachment for further details.

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 refer to the attachment.

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 refer to the attachment.

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

Attachment: Continuation of Part 2 and 3 of submission by Joanne Kathrine Whittle in respect of Notice of Requirement by KiwiRail Holdings Ltd for designation of land for construction and operation of a freight hub in Bunnythorpe.

I **OPPOSE** the notice of requirement for designation of land for an intermodal rail and freight hub between Bunnythorpe and Palmerston North. I seek the following decision from the Commissioners/Council: that KiwiRail's Notice of Requirement for a designation be DECLINED.

I **OPPOSE** the following parts of the Notice of Requirement (including appendices and Assessment of Environmental Effects (AEE)):

Scale and extent of planned operation: the scale and levels of adverse effects from the activities associated with the Freight Hub are inappropriate for the chosen location in a residential, rural and rural-residential area. This includes the effects of construction and operation of the Freight Hub, including: noise, light glare, dust, vibration, increased heavy traffic movements, community impacts impacts on landscape, ecology and amenity values and flood control. These effects will be felt well beyond those homes identified as directly affected, and will mean significant changes to the nature and character of the wider residential and rural area of Bunnythorpe and surrounding environs.

Decision sought: The designation should be declined. If the Council does not decline the designation outright, it should provide in the conditions of the designation for an operation that complies with the objectives, policies and rules of residential, rural and rural-residential areas in the District Plan, including construction and operational noise levels, hours of operation, types of activities permitted, emissions of light, dust and vibration, and landscape and amenity protection provisions.

Insufficient information provided in the Assessment of Environmental Effects to enable an informed decision to be made: The AEE should provide sufficient detailed evidence on what the effects of activities will be, to enable the Council to make a fully informed decision on the magnitude of those effects and whether they can be appropriately avoided, remedied or mitigated. KiwiRail has not done this in its AEE. Instead it has provided generalised statements about possible effects of both construction and operation, without sufficient detail for those most affected to be able to make a sound judgement as to the likely impact of those effects on their health, their environment, amenity values and wellbeing. In addition, it makes only vague references to the kind of mitigation measures and other provisions that it may make to mitigate the identified effects, without providing any definite information or evidence of the effectiveness or level of mitigation or relief that such proposed measures will actually provide. There are few specified mitigation measures, and certainly no evidence provided of the actual impacts these measures will have and whether these will totally or partially mitigate the adverse effects. Instead KiwiRail proposes to provide all these details only *after* approval of the designation, in at a later date, in its various proposed management plans. This is completely unacceptable. The paucity of clear evidence of effects, and a pervading lack of specific, rigorous and tested mitigation measures, means that the community and the Council are not in a position to be able to fully understand the adverse effects of the Freight Hub.

Decision sought: The Council should therefore decline KiwiRail's requirement for a designation and request it to notify a new, fully developed requirement with an adequate assessment of effects. If the Council chooses to approve the requirement, then it must specify specific, measurable and monitorable conditions in the designation to address the adverse effects including: maximum noise levels for construction and operation of the Freight Hub; specific measures and proven techniques to

control noise, dust, vibration, traffic movements, light glare, adverse impacts on the local landscape, ecological and amenity values, on water runoff impacts and flooding, and on the local community and surrounding areas. Conditions should ensure that these effects are mitigated to the extent that the Freight Hub meets the objectives, policies, rules and standards for residential, rural residential and rural areas in the District Plan.

24 hour operation, 7 days a week: The adverse effects of the proposed designation, including construction and operation of the Freight Hub, are greatly increased by the request to operate the Hub 24 hours a day, 7 days a week. This will impact not just on those identified as immediately affected, but also across large expanses of the surrounding rural and rural-residential areas. Noise travels easily at night in this part of the country, and light spill is visible from a long distance especially on clear nights. Bunnythorpe residents can hear approaching trains at night from kilometres distant, and disturbance from truck traffic noise is increased in comparison to daytime. Some of the greatest adverse effects of the project would be mitigated by setting reduced operating hours for both construction and operation of the Freight Hub. This is particularly important given the relative paucity of detailed information on exactly what activities will take place at night or during weekends, and by a total lack of specificity in the notice of requirement and supporting documents about the adverse effects of 24-hour operation, including on the health and wellbeing of locals.

A large industrial complex would never receive consent to operate on a 24-hour, 7 day a week, basis in residential, rural-residential or rural parts of other areas in Palmerston North district; certainly it would be deemed unacceptable in the middle of Hokowhitu or Fitzherbert or Turitea. Why then should the residents of Bunnythorpe be exposed to lower environmental standards? All citizens of Palmerston North City have equal rights to: enjoy peaceful Sunday morning sleep-ins; be able to enjoy a high degree of amenity both inside and outside their homes; view the stars without the glare from 177 ha of all-night lighting; have a respite from traffic noise in the dead of night; breath air that is not saturated with the dust of construction over an extended number of years; live free from fears for their health and mental wellbeing; be assured of a level of protection against the spectre of unanticipated and escalating impacts on their levels of amenity and environmental quality, and plan for the upkeep and improvement of their properties without fearing that the enjoyment of those properties will be permanently blighted by noise, dust, light glare, vibration, heavy traffic, and no respite 24 hours a day, 7 days a week.

Moreover, KiwiRail provides insufficient justification for a 24 hour operation. The AEE states that: 'Nighttime [noise of] operations have not been modelled but the affected area is expected to reduce as many elements of the Freight Hub would be primarily daytime activities'. This statement (typical of the vague and uncertain statements made throughout the AEE) makes it clear that there is no imperative on KiwiRail to run the Freight Hub as a 24-hour, 7 day a week operation.

Decision sought: That the Council declines KiwiRail's requirement for designation for a Freight Hub in Bunnythorpe, on the basis that a 24-hour, 7 day a week operation is totally inappropriate in the proposed location, and that the magnitude of the adverse effects from this on the environment and community have not been adequately addressed in KiwiRail's application. If the Council approves the designation, then activities associated both with the construction and the operation of the Freight Hub must be restricted to normal business hours and during the business working week (at the most, between 8am and 6pm, Monday to Friday).

Inadequate social impact assessment: The Community Engagement Report (Appendix E) states that mitigation measures have been developed from community feedback but does not identify what mitigation was introduced as a result of the feedback. The responses to community feedback are limited and relate to mainly minor issues, and this reflects the difficulties experienced by many in the Bunnythorpe community in comprehending the enormous scale of the proposed Freight Hub. Just as it is difficult to visualise very large numbers, it is also very difficult to visualise the scale and impacts on our lives and our rural and residential environment of suddenly becoming host to the largest industrial complex in the Manawatū region. The information provided by KiwiRail to support its notice of requirement, including the maps, is dense and difficult to interpret. It contains considerable jargon that requires specialist knowledge to understand. From discussions with neighbours and other locals, it is obvious that many are only beginning to comprehend the scale of this proposed industrial development, and to realise that it will come to dominate and indeed redefine the landscape, environment and amenity of our homes, our township and the wider surrounding rural area. Indeed some residents have told us they despair of being able to have any influence on what they feel is a foregone conclusion, despite deep apprehensions over the negative impacts of the proposed Freight Hub, and feel that, in colloquial language, it is a case of 'you can't fight city hall'. It is vital, therefore, that the Council, as the democratic representative and protector of the wellbeing and environment of all residents in Palmerston North City, appreciates the magnitude of community uncertainty and fear, which is well beyond that represented in the social impact assessment. Put simply, the data provided by KiwiRail certainly does not provide a reflection of the true scale and nature of the environmental impacts on Bunnythorpe. Much more information is needed to understand the true impacts on Bunnythorpe and environs, beyond the area identified by KiwiRail as immediately effected.

Decision sought: In the absence of this full assessment of social impacts, and any specific measures to mitigate or remedy these effects, the Council should decline KiwiRail's requirement for designation for a Freight Hub.

Insufficient consideration given to social and environmental values: The AEE states that the adverse effects in terms of the change in landscape, visual amenity and social effects of the Freight Hub must be considered against the positive effects of the Freight Hub, and that, 'On balance the adverse effects are acceptable in this environment.' This statement is very concerning. The stated positive effects are diffuse and vague and do not offer any advantage to the people most impacted; whereas the negative impacts fall entirely on the local community and should not be dismissed as unimportant when weighed against these supposed 'positive effects'. The supposed wider benefits (beyond the generation of profit for KiwiRail) should not come at the cost of placing an unfair burden on the lives of one small group of people.

I am also greatly concerned by KiwiRail's use of the phrase 'in this environment'; this strongly implies that, on balance, the same adverse effects would be unacceptable in another kind of 'environment'. There is an unsettling attitude displayed here by KiwiRail that indicates it considers that the environment of Bunnythorpe is somehow of lesser value than that of other areas. It is hard to imagine that the adverse effects generated by an extensive industrial complex, operating 24 hours a day, 7 days a week, would be 'acceptable' in any residential or rural environment. Such a statement undermines any confidence that the adverse effects have been fully appreciated or that they will be adequately addressed. It makes it difficult to trust that the proposed future outline plan and management plans will take the concerns of the community or the scale of impacts on Bunnythorpe residents seriously. It further reinforces the need for specific, monitorable and enforceable

conditions to be included in the designation. This is the only way to ensure that effects are fully mitigated, to a level that would be acceptable in ANY environment.

The vagueness of the meaning of 'acceptable' is also very troubling. The AEE sets out a long and diverse list of adverse effects and outlines possible mitigation measures, thereby indicating that these effects are sufficiently serious as to require remediation, and then in its summary statement it dismisses all these adverse effects as 'acceptable'. To whom would these effects be 'acceptable' and who is doing the 'accepting'? The level at which something is 'acceptable' is very much open to interpretation. To KiwiRail board members, living far from the Freight Hub, the adverse effects may indeed seem acceptable. The adverse effects of nuclear testing at Mururoa Atoll were acceptable to the French government from its position half a world away in Paris. To the local and wider community around Bunnythorpe, however, these adverse effects are unacceptable.

Decision sought: The Council has the opportunity to ensure that the many adverse effects that will be created by the Freight Hub are not accepted but instead avoided, by declining KiwiRail's requirement for the Freight Hub. Should the Council choose to approve the designation, then it must ensure that these adverse effects are controlled through specific and comprehensive conditions on the designation that can be monitored and enforced, and that ensure KiwiRail is giving proper value to the environment, landscape and amenities, as well as the concerns and fears, and the rights of the Bunnythorpe community.

Adverse effects of noise and vibration from construction and operation of the Freight Hub: The notice of requirement does not provide sufficient evidence of the measures that will be taken to avoid, remedy or mitigate the adverse effects of vibration and noise from the construction and operation of the Freight Hub. It leaves the provision of evidence and the consequent adoption of appropriate mitigation measures to be included in the Outline Plan of Works after the designation is in place.

The AEE mentions measures to mitigate vibration effects during construction that it may instigate 'if necessary'. This is just one of many examples of vague, unsupported and unevidenced mitigation measures, offering insufficient information and assurance to enable a decision to approve the requirement. KiwiRail should have undertaken studies in advance of submitting its requirement to determine the extent of impact and what measures will be necessary. The operational noise mitigation measures proposed in the AEE are similarly vague and their impacts uncertain. Where is the modelling to show (a) what noise levels will be reduced to when these mitigation measures are in place and (b) how the footprint or extent of effects is likely to be reduced? It is not possible to tell from the information provided what the actual extent of the proposed (and untested) measures to reduce noise is likely to be.

The AEE recommends a future Noise Management Plan (NMP), to be developed after the designation has been approved, that would set out matters such as the noise and vibration criteria, noise modelling and barrier design, good practice site noise management measures, and community liaison and complaints processes. It also proposes establishing a Community Liaison Forum which should include regular meetings where noise issues can be raised and considered. The AEE also states that 'modelling may indicate the need for refinement/optimisation of noise barrier heights'. It seems incredible that such modelling has not already been done, as a minimum requirement in preparing the AEE. Without such modelling done in advance, how can the Council or the affected community gain any real understanding of the effects of the operation of the Freight Hub, or given approval to the designation without any confidence that these effects can be adequately mitigated

and enforced? Potential effects and appropriate mitigation measures should have been fully explored and fully tested as part of the preparation of the AEE. A fully developed AEE would already include the necessary conditions and criteria, and would establish and commit to appropriate good practice and mitigation conditions, which would preclude the need for any complaints procedure once the Freight Hub was operating. The community liaison forum should also have been established in advance of the notice of requirement, to ensure that the community fully understood potential effects and so it could work with KiwiRail to ensure appropriate mitigation measures were in place.

Overall, while the AEE refers to some standards for construction noise and vibration, it is not possible from this information to gain a clear understanding of how these standards will be applied, monitored and enforced, nor to understand the specific magnitude of the noise and vibration effects on the wellbeing, amenity, health and lives of the surrounding community. The following statement provides just one example of many where the information is simply insufficient and too vague to provide someone like me, who will be living with these effects for a period of up to six years, day in and day out, with any useful information or certainty: 'Construction Noise which is also the construction noise standard used in the PNDP18. In the absence of any applicable New Zealand standards for construction vibration or PNDP criteria, construction vibration has been assessed in accordance with the Waka Kotahi developed construction vibration criteria which is based on the vibration standards from other countries.' I cannot tell from this whether my children will be able to sleep at night or instead be shaken awake a dozen times in the wee small hours by the movement of trucks, rollers and diggers. No evidence is provided to allow me to ascertain to what extent the non-specific, potential mitigation measures mentioned in the AEE will alleviate these effects. Such a level of uncertainty leaves me anxious about the mental and physical health of myself and my family, and for our ability to enjoy our home and garden, for many years to come.

Decision sought: That the Council declines the requirement, on the basis that KiwiRail has provided insufficient information on the adverse effects of vibration from the construction and operation of the Freight Hub. If the Council chooses to approve the requirement, then it should specify specific, measurable and monitorable conditions and measures to avoid adverse effects from vibration and noise from construction and operation of the Freight Hub. In addition, given the lack of clarity about the magnitude of the effects and the effectiveness of any mitigation measures across a 24-hour period, the Council should restrict the hours of both construction and operation activities to the ordinary working day (to a maximum of between 8am and 6pm, Monday to Friday).

Request for extension of enactment of requirement to 15 years: The company has given no convincing evidence as to why it requires this extension. Either the company has the resources to realise this project within the next decade, or the requirement should be withdrawn.

Decision sought: That the Council declines the request to extend the duration of the requirement to 15 years as requested by KiwiRail.

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

NUMER OF PAGES

Continue on separate sheets if necessary

SUBMITTER DETAILS

Full name of Submitter Nexus Logistics Limited

Postal Address PO Box 76034 Manukau City 2241

Phone 021984006

Email darcy.hart@nexuslogistics.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 proposed Kiwirail regional freight hub within the Manawatu

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.)

Fully support the proposed Kiwirail new regional freight hub

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)

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

**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
By email: submissions@pncc.govt.nz

CC:

KiwiRail Holdings Limited
By email: pam.butler@kiwirail.co.nz

NAME OF SUBMITTERS:

Peter Gore and Dale O'Reilly

This is a submission on a notice of requirement from KiwiRail Holdings Limited (**Kiwirail**) for a designation (the **notice of requirement**).

The designation required by Kiwirail is in the Palmerston North City Council District Plan in respect of a project, being the construction and operation of a new intermodal rail and freight hub on land between Palmerston North and Bunnythorpe (**Freight Hub**).

We are not trade competitors for the purposes of section 308B of the Resource Management Act 1991.

Our submission relates to all parts of the notice of requirement.

We oppose the notice of requirement in its entirety for the reasons set out below:

1. We own (or otherwise control property interests in) approximately 26 hectares of land, of which nearly 21 hectares is within the proposed designation area. Our holdings span both sides of Te Ngaio Road on numerous titles, outlined in green on the attached plan. This land has been farmed continuously by our family since they purchased the land and cleared the bush in the early 1890s.

We presently live on and are sustained by this land, where we raise livestock and produce vegetables.

2. The red outline on the attached plan is the subject of the notice of requirement. The red and green outlines show that if the designation is confirmed and the Freight Hub proceeds we will be left with a house at 242 Te Ngaio Road, which will be heavily impacted by the adverse effects of the construction and operation of the Freight Hub, and an area of land too small to sustain us in the way that our present farm does.
3. The assessment of alternative sites for the Freight Hub is flawed. The flaws include, but are not limited to:
 - (a) Failure to involve Kainga Ora representatives or community representatives in Workshop 1 for the consideration of alternatives;
 - (b) A failure to properly take account of effects on the Mangaone Stream and its tributaries;
 - (c) A failure to properly take account of the visual and landscape effects of "Option 3", such as by distinguishing it from Option 4, when both have in common rolling landforms and proximity to residences;
 - (d) Reliance on artificial distinctions concerning the "Property degree of difficulty" criterion;
 - (e) Failure to take account of the regularity of flooding of the Mangaone stream or its tributaries in the vicinity of "Option 3", which occurs at least once a year;
 - (f) Persistent under-representation of the location of "Option 3" as if it is 'close to' but outside Bunnythorpe, when the reality is that the site extends into the township itself;
 - (g) Failure to take account of Settlers hut affected by Option 3c within the heritage and archaeology criteria;

- (h) Inconsistent approaches taken to visual and landscape matters, such as treating 'proximity to existing industrial centre' as a mitigating factor for Option 3, but not applying the same approach for Option 4;
- (i) Reliance on artificial distinctions between Options 4 and 3 concerning community cohesion;
- (j) Failure to take account in the "Engineering degree of difficulty" criterion that the wastewater system also runs along the length of Te Ngaio Road from at least Maple Street to Railway Road;
- (k) Information concerning future roading options seems to have been provided to the participants in the workshops, and factored into their consideration, but such information has not been made available as part of the publicised notice of requirement or supporting documents;
- (l) Failure to take into account the natural springs under the site in the "Engineering degree of difficulty" criterion;
- (m) The noise and vibration assessment fails to identify which buildings are industrial and which residential for the purposes of comparison between Options 3 and 4;
- (n) The weighting of heritage and archaeology factors was reduced between Workshop 3 and Workshop 2, which fails to recognise or account for the settlers hut and another two late 1800s house sites – Gore's and Major's;
- (o) Improperly attributing greater weight to Rail, Natural environment, Economic, Connectivity, Strategic Fit, Community Cohesion and Tangata Whenua values criteria than to criteria concerning direct amenity affects on residents (i.e. noise and vibration);

- (p) Improperly assessing that heavy vehicles and other trips through Bunnythorpe would reduce as a result of the project, when traffic rerouted onto the “new” Railway Road will go through the centre of Bunnythorpe;
 - (q) Improperly treating the Bunnythorpe Recreation Reserve as a constraint, when the reserve is and always has been leased as farm land and is able to be accessed off Stoney Creek Road and Tutaki Road; and
 - (r) Presence of lifestyle blocks is identified as a relevant factor under the “community cohesion” criterion for Option 4, but disregarded for Option 3, when there are lifestyle blocks on Parrs Road, Tutaki Road, Sangsters, Te Ngaio Road and Maple Street.
4. The notice of requirement and supporting information lack adequate detail to enable a proper assessment of Environmental Effects. In particular, the level of detail for the design, construction and operation of the Freight Hub is in many respects conceptual, leaving important matters of detail to be addressed by future mechanisms, with insufficient certainty that the risks of significant adverse effects for nearby residents, including us, will be appropriately avoided, remedied or mitigated.
5. We are concerned about the noise and vibration effects on existing, permitted or consented houses (including but not limited to those on Te Ngaio Road) from construction and operation of the Freight Hub. Reasons for our concern include, but are not limited to:
- (a) Kiwirail’s noise assessment states that construction works could be closer than 50 metres to houses on Te Ngaio Road and behind houses on Maple Street.
 - (b) Kiwirail’s noise modelling demonstrates that the noise effects on these, and other properties, will be significant, and standards for protection of acoustic amenity will be breached

in the absence of mitigation, and may even be exceeded with mitigation.

- (c) Kiwirail's noise assessment asserts that positioning the log yard away from houses on Maple Street is a factor that will lessen noise and vibration exposure for those properties, but this places the log yard closer to the houses on Te Ngaio Road.
- (d) In any event, Kiwirail's noise assessment states the Freight Hub layout is only indicative, and is likely to be adapted and refined. Adaptations that may be relatively insignificant to the Freight Hub operator may have a serious impact on the acoustic amenities of neighbouring properties.
- (e) Despite Kiwirail's emphasis on the need for 24/7 operations, and despite Kiwirail's noise assessment identifying that many of the *other* significant noise sources in this area subside in the evening and at night, night time operations have not been modelled for noise,
- (f) Despite Kiwirail's emphasis on the need for 24/7 operations, Kiwirail's noise assessment assumes the noise contours will decrease at night.
- (g) Kiwirail's noise assessment is based on existing houses, and fails to take account of housing that could be introduced as a permitted activity or under any unimplemented consents.
- (h) Kiwirail's noise assessment has not applied any corrections for special audible characteristics in relation to any of the Freight Hub noise sources.
- (i) There is insufficient assurance that proposed mitigation will be effective. Even with substantial noise barriers, Kiwirail's noise assessment concludes that further measures will be needed to control potential noise effects. These measures take the form of future monitoring, future modelling and future management plan techniques, none of which provide

adequate assurance *now* that reasonable levels of acoustic amenity for nearby residents will be preserved.

- (j) The likelihood of significant adverse noise effects is reinforced by Kiwirail's experience of problematic noise complaints in relation to its existing freight yard.

6. We are concerned about the visual amenity and landscape effects on existing, permitted or consented houses (including but not limited to those on Te Ngaio Road) from construction and operation of the Freight Hub. Reasons for our concern include, but are not limited to:

- (a) Kiwirail's assessment is based on existing houses, and fails to take account of housing that could be introduced as a permitted activity or under any unimplemented consents
- (b) Kiwirail's assessment is that the adverse effects of the Freight Hub on the natural landscape will be high, including proposed mitigation, and adverse effects on the urban landscape for houses retained at the eastern end of Te Ngaio Road will need further investigation.
- (c) Kiwirail's assessment is that there is potential for high adverse effects on visual amenity from nearby residential properties, including along Te Ngaio Road, east of Maple Street, and even with mitigation the effects may remain high.
- (d) Kiwirail has not developed methods to avoid, remedy or mitigate these effects, and rather proposes to investigate options for mitigation during the next (detailed design) stages of the project. This provides no assurance that the effects will be avoided, remedied or mitigated to an appropriate level.

7. We are concerned about the stormwater effects and related impacts on the Mangaone Stream and its tributaries. Reasons for our concern include, but are not limited to:

- (a) Every time the Mangaone Stream gets over half full it backs up into its tributaries and onto the current flood plane. Kiwirail's stormwater assessment makes no allowance for this, and rather assumes stormwater will flow through the site towards the Mangaone.
 - (b) The backflows from the Mangaone cause extensive flooding of our property on a regular basis. Te Ngaio road is closed at least once a year due to flooding. When Jacks Creek breaches between Maple Street and Kairanga-Bunnythope Road it flows through the intersection of Maple Street and Te Ngaio Road directly into the ponding. Adding to this the proposed Freight Hub site contains natural springs. None of this has been taken into account in Kiwirail's assessments.
- 8. We are concerned about the potential effects on heritage values. Reasons for our concern include, but are not limited to:
 - (a) The potential for the sections settled by Charles and Ellen Gore and the Major family to be archaeological sites has not been acknowledged or explored in Kiwirail's archaeological report. The Gores and Majors were pioneering families who settled in the 1890s and were the first European owners who cleared the bush to farm.
 - (b) The impact of the Freight Hub on the Glaxo factory, a historical site in close proximity to the Site.
 - (c) The impact of the Freight Hub on the heritage value of the Site, particularly the 'settlers hut' still standing on Section 16.
- 9. We are concerned about the impact of the Freight Hub on productive farm sites in the area. Our family has farmed our land for multiple generations, and to this day we run a farm on our land where we raise livestock and produce vegetables. We know of a number of other small farms on the Freight Hub site which are productive. The proposal will bring this productive use of the land to

an end. Kiwirail's assessment of environmental effects does not properly take this into account.

10. We are concerned about the relationship between the Freight Hub and roading plans in the Bunnythorpe area, including the Regional Freight Ring Road and the Bunnythorpe bypasses. The reasons for our concern include:
 - (a) The combined effects of these rail and road plans have not been assessed. The Regional Freight Ring Road currently being planned between NZTA, PNCC and Horizons will add enormously to the detrimental effects on the community as well as the people and township of Bunnythorpe, but this has not been assessed on top of the effects of the Kiwirail Hub, even though the notice of requirement has provided specifically for the Northern part of Kiwirail's perimeter road to become part of the Regional Freight Ring Road, which we are told will in turn be designated a State Highway. This is within the Town of Bunnythorpe (as is a fair portion of the Freight Hub), not 'in close proximity to' which is how the notice of requirement describes the Kiwirail Hub. We believe these two projects' effects on us and the Bunnythorpe Community of over 700 people will be so great as to be unable to be mitigated
 - (b) Seeking RMA approvals separately for these closely related infrastructure projects is a serious failure in integrated planning, considering that each project stands to impact on the same community in terms of emissions, noise, vibrations, light pollution, visual amenity, and importantly social cohesion. The advancement of separate RMA processes for each project will prevent these overlapping adverse effects from being assessed (let alone managed, if that were possible) in a properly comprehensive way.
 - (c) The full benefits of the proposed Freight Hub depend on upgrading the roading infrastructure to unlock the distribution potential of the region, as identified in the 2018

NLTP case study. As the Freight Hub is being progressed by Kiwirail separately from the roading initiatives, it is not possible to properly assess whether the projects will successfully realise their respective (or collective) intended benefits.

11. The Assessment of Environmental Effects contains factual inaccuracies and omissions, including but not limited to:
 - (a) Kiwirail have identified that there are no suitable habitats for the black-fronted dotterel, an 'at-risk' species, in the Bunnythorpe farmlands. The black-fronted dotterel does in fact frequent the Bunnythorpe farmlands. This should be taken into account.
 - (b) The assessment artificially identifies residentially "zoned" sites as opposed to sites in residential use. In doing so, it downplays the significant number of residences proximate to the Freight Hub, including those on Clevely Line, Sangsters Road, Parrs Road or Tutaki Road .
 - (c) The report does not mention that the wastewater sewer runs the length of Te Ngaio Road and address the impacts on this wastewater infrastructure.
 - (d) The report has suggested that the future Western and Southern road networks planned by Waka Kotahi will bypass Bunnythorpe, which is incorrect.
12. The Freight Hub is contrary to applicable planning policy, including but not limited to:
 - (a) In the Horizons Regional Policy Statement, Policy 3-3;
 - (b) In the Palmerston North City District Plan:
 - i. In the Rural Zone chapter: Objectives 3 and 4, and Policies 2.2, 2.3, 3.2, 3.3, 4.1, 4.3 and 5.2;
 - ii. In the North East Industrial Zone chapter: Policy 5.2;

- iii. In the Natural Hazards chapter: Policies 2.1 and 2.3;
and
 - iv. In the Utilities chapter: Policy 2.2,
13. We oppose Kiwirail's request for a lapse period of 15 years. In various parts of its documentation, it is stated that construction may take up to 20 years. In this context a lapse period of 15 years is inappropriate, and will leave us exposed to a long period of uncertainty before construction may commence, followed — if construction does commence — an even longer construction period. We object to a lapse period of any more than 5 years in these circumstances.
14. We also object to being provided a mere 20 working days to respond to the voluminous material amassed by Kiwirail in support of its notice of requirement. Kiwirail has presented more than 50 documents in support of the notice of requirement, many of the them highly technical in nature and content. We have been significantly prejudiced by having such a short time to evaluate and respond to such a large volume of technical material. In the circumstances we consider Palmerston North City Council ought to have exercised its powers under the RMA to extend the time frame for making submissions.

DECISIONS SOUGHT

We seek the following recommendation or decision:

- 1. That the Palmerston North City Council recommend to Kiwirail that it withdraw the notice of requirement;
- 2. In the alternative, that the Palmerston North City Council recommend to Kiwirail that it modify the notice of requirement, specifically to address the matters of concern identified above;

3. In the alternative, that the Palmerston North City Council recommend to Kiwirail that it impose conditions on the notice of requirement specifically to address the matters of concern identified above.

We wish to be heard in support of our submission.

If others make a similar submission, we will consider presenting a joint case with them at a hearing.

Signature:



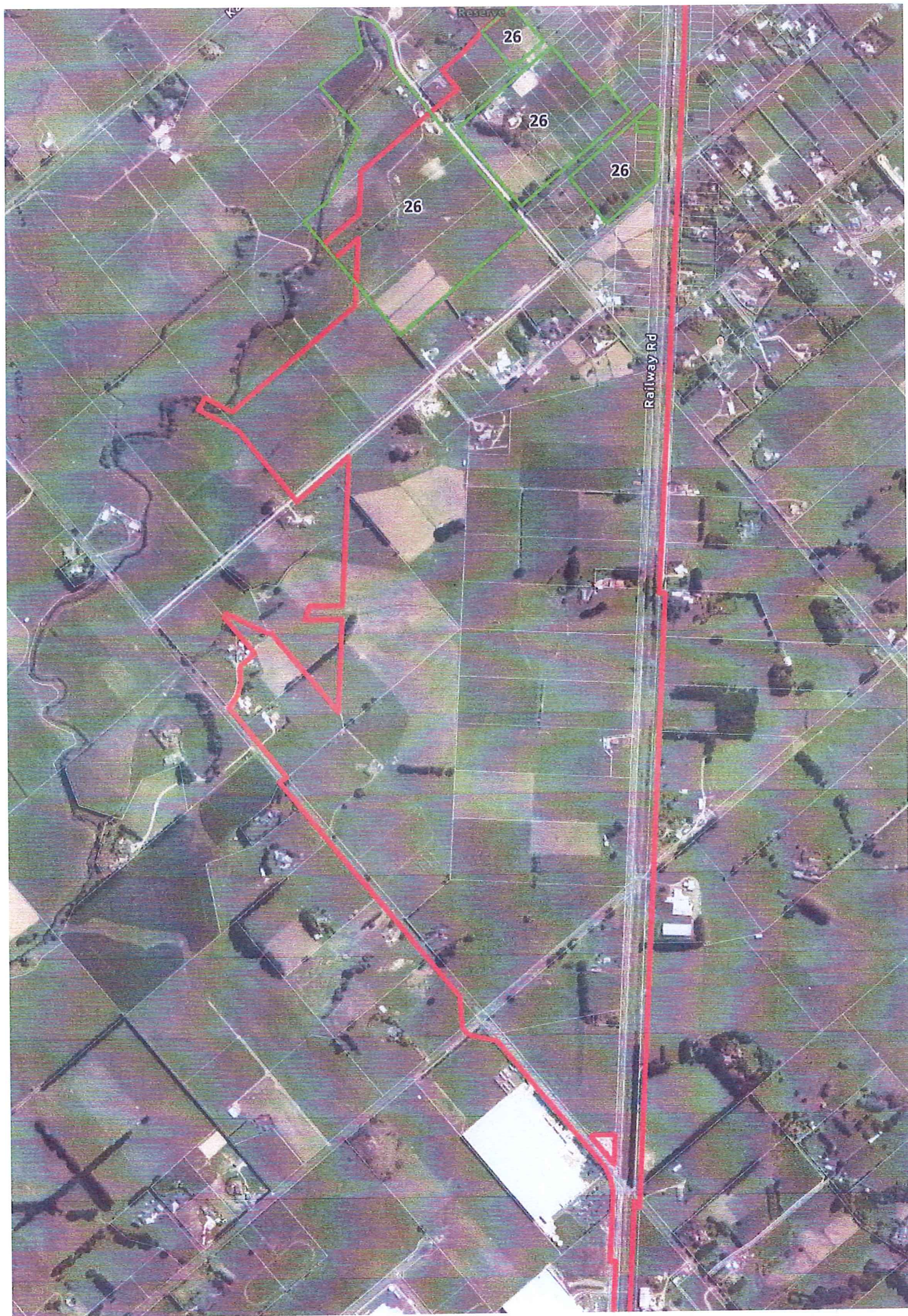
Phil Shannon
Solicitor for the Submitters

Date: 26 March 2021

Electronic address for service of submitter: phil@turnerhopkins.co.nz

Telephone: (09) 486 2160

Postal address: Turner Hopkins (Attn: P Shannon), PO Box 33237,
Takapuna, Auckland 0740



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 Mary Anne Chapman
Postal Address 20 Tula Lane Phone 021. 268 2887
RD 10 Email Colin-mary@extra.co.nz
Palmerston North 4470
Signature [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 effect the proposed location will have
in relation to noise 24/7 and
changes of traffic flows etc and the
effect to my location

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.)

noise pollution and potential fires
due to the predominant westerly wind
Also possible increase of water that might
run into the small stream that runs from the west
through my property

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 they seek an alternative
site that will not affect so many
people. If sited in an unpopulated
area this would have less impact.
Obviously this might mean another area covered by
another Council.

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

my property is within an area close
to the proposed location

PLEASE SEND YOUR SUBMISSION BY 4PM, 26 MARCH 2021**MAILING TO**

Palmerston North City Council
Private Bag 11-034,
Palmerston North
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