

15 March 2024

Independent Hearing Panel
 Proposed Te Tai o Poutini Plan
 PO Box 66
 Greymouth 7840

By email to: chu.zhao@wrc.govt.nz

Dear Commissioners,

Proposed Te Tai o Poutini Plan – Subdivision, Financial Contributions and Public Access Hearing

KiwiRail Holdings Limited (**KiwiRail**) is the State-Owned Enterprise responsible for the management and operation of the national railway network. This includes managing railway infrastructure and land, as well as rail freight and passenger services within New Zealand. KiwiRail is also the Requiring Authority for land designated "Railway Purposes" in District Plans throughout New Zealand.

KiwiRail generally supports the Council Officers' (Ms Belgrave and Ms Evans) recommendations contained in the 'Section 42A Officer's Report – Subdivision, Financial Contributions and Public Access'. The Council Officers accepted the majority of KiwiRail's submission points on this topic¹ and these submission points are not discussed further in this letter.

The Section 42A Report makes recommendations on two KiwiRail submission points that were not wholly accepted or were rejected. I have provided responses to the recommendations in the table below.

Submission number	Provision	Recommendation	Response to Council Officers' recommendations
S442.067	Policy SUB-P6	Rejected	<p>KiwiRail sought an amendment to Policy SUB-P6 to ensure subdivision is avoided in all zones that could result in reverse sensitivity effects on infrastructure. The Council Officers recommended rejecting KiwiRail's relief as reverse sensitivity effects primarily arise from zoning patterns and land use activities rather than subdivision (and so it is appropriate to manage potential effects via zone provisions).</p> <p>KiwiRail is seeking appropriate reverse sensitivity policies in other Chapters of the Proposed Plan² and on that basis, will not</p>

¹ S442.064, S442.069, S442.070, S442.071 and S442.072.

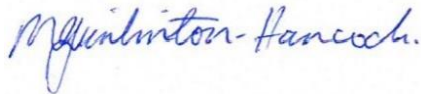
² S442.026; S442.081; S442.084; S442.086 and S442.088.



			pursue the relief sought for the Subdivision Chapter further.
S442.065	Policy SUB-P2	Accepted in part	<p>KiwiRail's submission sought to retain Policy SUB-P2 as proposed to ensure stormwater discharge onto the rail corridor does not disrupt the safe and efficient function of the railway network. The Council Officers recommended an amendment as a result of Te Mana Ora's submission as follows: "<u>Provision for safe and efficient and effective transport connections and linkages, including pedestrian, cycling linkages, public transport and vehicle access</u>".</p> <p>KiwiRail considers that the word "efficient" should also be included in SUB-P2 to align with the amendment accepted to Objective SUB-O2, which refers to the "safe and efficient operation of critical infrastructure".</p>

I can confirm that KiwiRail does not wish to be heard at the hearing. However, I am available to answer any questions from the Hearing Panel either in writing or via videoconference if required.

Yours faithfully,



Michelle Grinlinton-Hancock

RMA Team Leader

KiwiRail Holdings Limited

