

9 September 2024

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

By email to: [chu.zhao@wrc.govt.nz](mailto:chu.zhao@wrc.govt.nz)

Dear Commissioners,

**Proposed Te Tai o Poutini Plan – Topic 19A (Natural Hazards)**

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 made a submission on the Proposed Te Tai o Poutini Plan (**Proposed Plan**) on 27 October 2022. Three of KiwiRail's submission points on the TTPP have been allocated to Topic 19A.<sup>1</sup>

KiwiRail generally supports the Council Officers' (Ms Gunnell and Mr Beban) recommendations contained in the 'Section 42A Officer's Report – Natural Hazards – Ngā Mōreareatanga Aotūroa'. For completeness, KiwiRail's position on the Council Officers' recommendations relevant to KiwiRail's submission points is set out in the table below.

Submission number	Provision	Council Officers' recommendation	Response to Council Officers' recommendation
S442.044	NH-O3	Accepted in part: <sup>2</sup>  "To only locate <del>critical</del> <u>regionally significant</u> infrastructure within <del>areas of significant natural hazard risk</del> <u>the Severe Natural Hazard Overlays</u> where there is <del>no reasonable alternative</del> <u>an operational or functional need to be located within these overlays</u> , and to design infrastructure so as not to <del>exacerbate natural hazard</del> <u>increase the risk to people and <del>property</del> buildings.</u> "	KiwiRail sought to retain Objective NH-O3 as notified. The Council Officers have recommended amendments to this objective in response to Manawa Energy's submission to encourage regionally significant infrastructure to establish outside of areas subject to significant natural hazard risk, unless there is an operational or functional requirement for the infrastructure to be located in those areas.  KiwiRail accepts the Council Officers' position.

<sup>1</sup> S442.044, S442.045, S442.046.

<sup>2</sup> Section 42A Officer's Report (Natural Hazards) at [269].



S442.045	NH-O6	<p>Accepted in part:<sup>3</sup></p> <p>"Measures taken to mitigate natural hazards do not <del>create or exacerbate adverse effects on other</del> <u>increase the risks to people, property, buildings and regionally significant infrastructure and the environment.</u>"</p>	<p>KiwiRail sought to retain Objective NH-O6 as notified. The Council Officers have recommended minor amendments to this objective to ensure consistent wording with other objectives and policies in the Natural Hazards chapter.</p> <p>KiwiRail accepts the Council Officers' position.</p>
S442.046	NH-P3	<p>Accepted in part:<sup>4</sup></p> <p>"When managing natural hazards:</p> <p>(a) Promote the use of natural features, <u>natural systems</u> and appropriate risk management approaches in preference to hard engineering solutions in mitigating natural hazard risks; and</p> <p>(b) Avoid increasing risk to people, <del>property and the environment</del> <u>and buildings</u>; while</p> <p>(c) Recognising that in some circumstances hard engineering solutions may be the only practical means of protecting <del>existing</del> communities and <del>critical</del> <u>regionally significant infrastructure</u>; and</p> <p>(d) <u>Enabling planned and funded natural hazard mitigation works within the Natural Hazard Overlays where these works are being undertaken by a Statutory Agency or their nominated contractor and these will decrease the existing risk to people's lives and wellbeing, buildings and regionally significant infrastructure.</u>"</p>	<p>KiwiRail sought to retain Policy NH-P3 as notified. The Council Officers have recommended minor amendments in response to the changes sought under general submissions on the Natural Hazards chapter.</p> <p>KiwiRail accepts the Council Officers' position.</p>

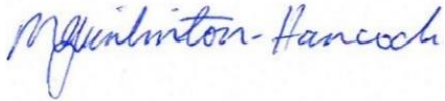
<sup>3</sup> Section 42A Officer's Report (Natural Hazards) at [292].

<sup>4</sup> Section 42A Officer's Report (Natural Hazards) at [353].



KiwiRail does not wish to be heard at the hearing for Topic 19A, and respectfully requests this letter is tabled as a record of KiwiRail's position. I am available to answer any questions from the Hearing Panel either in writing or via videoconference if required.

Yours faithfully,

A handwritten signature in blue ink that reads "Michelle Grinlinton-Hancock".

Michelle Grinlinton-Hancock

**Manager RMA Team**

**KiwiRail Holdings Limited**

