

6 November 2024

Independent Hearings 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 – Topic 20 (Outstanding Matters and Variation 1 – Activities on the Surface of Water)

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 (**TTPP**) on 27 October 2022. One of KiwiRail's submission points on the TTPP has been allocated to Topic 20.¹

KiwiRail's submission sought an amendment to the TTPP planning maps to remove overlays for Outstanding Natural Features (**ONFs**), Outstanding Natural Landscapes (**ONLs**), and Outstanding Natural Character (**ONC**) from land subject to KiwiRail's designation.² The Council Officer reporting for the Outstanding Matters topic (Ms Easton) has rejected this submission on the basis that the overlays for ONFs, ONLs and ONC relate to the location of a specific feature, and in some instances that feature occurs within KiwiRail's designation (eg where the designation is wider than the railway line working area or includes land that is covered by bush or has associated values).³ Ms Easton also noted that any works done within KiwiRail's designation do not require resource consent.⁴

KiwiRail continues to seek the relief sought in its submission, that the overlays for ONFs, ONLs and ONC be removed from the extent of KRH1 in the TTPP.⁵ I refer to my earlier letter for Topic 19B (Coastal Environment) which set out the importance of recognising and providing for activities that are necessary to ensure the safe and efficient operation of the railway network (which is defined as regionally significant infrastructure in the TTPP), including in circumstances where those activities need to be undertaken in sensitive environments.⁶ As set out in that letter, the West Coast Regional Policy Statement provides broad policy direction for regionally significant infrastructure to locate in sensitive environments, and KiwiRail seeks that direction be reflected in the TTPP.⁷

¹ Submission 442.096.

² KRH1 KiwiRail Holdings Limited.

³ Te Tai o Poutini Plan – Section 42A Officer's Report Outstanding Matters dated 23 October 2024 at [27].

⁴ Te Tai o Poutini Plan – Section 42A Officer's Report Outstanding Matters dated 23 October 2024 at [27].

⁵ As set out in KiwiRail's submission, the objective of identifying ONFs, ONLs and ONC is to ensure that these landscapes and their attributes are recognised and protected from inappropriate subdivision, use and development. The benefits of infrastructure are provided irrespective of location. The TTPP also recognises the functional need for infrastructure to be located in these areas, and that designated land transport corridors are generally highly modified areas.

⁶ Letter on behalf of KiwiRail Holdings Limited dated 23 September 2024 at page 2.

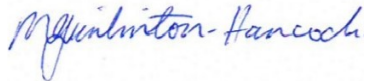
⁷ Letter on behalf of KiwiRail Holdings Limited dated 23 September 2024 at page 1.



The relief sought by KiwiRail in respect of Topic 20 will appropriately recognise that there may be a functional or operational need for KiwiRail to carry out maintenance, repair and upgrade activities on the railway network where it is located within the overlays for ONFs, ONLs and ONC.

At this stage, KiwiRail does not wish to be heard at the hearing for Topic 20, 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

