



Te Rūnanga o NGĀI TAHU

12 February 2025

Te Tai o Poutini Plan Hearing Panel
c/- Chu Zhao
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West Coast Regional Council

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For the Attention of the Hearing Panel – Response to Noise s42A Addendum Report #2 prepared by Rachael Elizabeth Pull on behalf of Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio and Te Rūnanga o Ngāi Tahu (Submitter 620 and Further Submission 41)

Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio and Te Rūnanga o Ngāi Tahu (**Ngāi Tahu**) are providing the following response to Minute 59 regarding the Noise s42A Addendum Report #2 (**addendum**).

Ngāi Tahu lodged a submission on rule NOISE-R3 (S620.211) and provided a statement to the Panel prior to the hearing. Ngāi Tahu respectfully requests that this response be tabled for the Panel's consideration, to confirm its position in relation to its original submission points and the addendum recommendations.

State Highway/roading corridor rule

I support the position in the addendum for the NZ Transport Agency Waka Kotahi (**NZTA**) noise contour to take into account topography. However, I would like clarification that the roading corridor overlay is based on West Coast specific traffic volumes which create a measurable adverse effect, as parts of the State Highway network do not receive sufficient traffic volumes to require this additional burden on private property.

The NZTA State Highway traffic monitoring data¹ shows a variety in annual average daily vehicle traffic on the West Coast between 230 (Mokihinui River) and 4100 (Greymouth).

As a comparison, the traffic monitoring data for Whanganui shows between 4,000 (near Maxwell at the western edge of the district) and 13,000 (within city limits) annual average daily traffic for State Highway 3. For State Highway 4 north of the Whanganui River Road (a main tourist attraction) the annual average daily traffic is less than 1000.

¹ [State highway traffic monitoring – annual average daily traffic](#)

The Whanganui District Plan recognises the variety of traffic volumes (and therefore reserve sensitivity effects), by having different setbacks for different parts of the state highway network and by only having it apply outside the urban limits (as achieved by having the roading speed limits in the rule):

- a. *Within 80 metres of any portion of the State Highway 3 designation (District Plan reference: D207) where a posted speed limit of at least 70km/hr applies; or*
- b. *Within 80 metres of any portion of the State Highway 4 designation south of the Whanganui River Road intersection (District Plan reference: D215) where a posted speed limit of at least 70km/hr applies; or*
- c. *Within 50 metres of any portion of the State Highway 4 designation north of the Whanganui River Road intersection (District Plan reference: D215) where a posted speed limit of at least 70km/hr applies; or*
- d. *Within 50 metres of any portion of a State Highway designation (District Plan reference: D207 and D215) where a posted speed limit of less than 70km/hr applies, but only in respect to new residential units erected on such a site²;*

I have not been able to review the maps for the Te Tai o Poutini Plan roading noise contour to see if a similar approach has been applied, which I would support. I request that the proposed overlay (or a link to them) are circulated to submitters.

Railway line rule

The overlay maps from KiwiRail Holdings Limited (**KiwiRail**) are available online as part of the evidence for the hearing as a pdf. My comments on the KiwiRail overlay are as follows:

- I have not seen the data that shows that the frequency and volume of the railway network usage in the West Coast requires that requires the setback to be 100m. Where this is excessive due to lack of regular use by the rail activities, this setback should be reduced or removed to not create unreasonable costs and restrictions on private property. A large blanket distance creates unreasonable costs for landowners.
- As a comparison, the Whanganui District Plan has a setback of 30 metres from the railway designation.
- The overlay has not taken account of the topography.
- The rule also applies to any railway line – this could pick up more than just the KiwiRail designation area, such as tourism or industry that use a type of railway line. A solution to this problem would be to only have it apply to railway lines managed by requiring authorities/network utilities.
- I agree with the addendum that the measurement of an overlay should start from the railway line rather than the designation edge, due to the various width of the designation potentially creating excessive costs on private property. If this overlay is put into the maps as a fixed line, then it won't move until the next plan review, which would provide some

² Whanganui District Plan rule NOISE-S2 Noise Sensitive Activities (including residential units). [District Plan - District Plan](#)

certainly to the adjoining owners and occupiers, even if the physical railway line moves within the designation during that period.

There is a nohoanga entitlement at Moana/Lake Brunner, directly across the road from the railway designation and approximately 40m from the physical railway line. It is within the current area identified by the KiwiRail maps, but it until decisions are released on definitions, it is unclear if using the settlement right would breach the Noise Sensitive Activity rules.

Hokitika Overlay

This would impact Māori Purpose zoned land at Arahura (see map in **appendix one**) and potentially a nohoanga entitlement at Taramakau River (located about 280m from the rail line, but significantly closer if the designation is where the measurement is taken from). I support protecting the health and wellbeing of the people who may occupy these sites in the future but believe Māori Land should be enabled except where there is specific site evidence that there are potential adverse health effects, which I have not seen at this point.

These sites could be impacted by the alert overlay for the Hokitika Line. While there are proposed to be no direct rules, the impact of the overlay would bring the objectives and policies of the chapter into consideration during a discretionary or non-complying activity, or where consideration on any overlay is a matter of discretion. This would make it more expensive and time consuming to develop. It will also show on property information for the site, potentially impacting property values as it will indicate a lower amenity and higher compliance costs to develop in the future.

I note that much of the Hokitika railway line is directly adjoining the State Highway network³, meaning that much of the potential noise effects are already remedied by the NZTA rule for this section of the network. Compliance with the roading corridor rule would also include protection from the adjoining railway network, as compliance would be measured against the total noise environment and not be specific to noise generated from the State Highway network.

I do not believe there is sufficient information currently to warrant an alert overlay for the Hokitika line. The overlay as proposed would be excessive compared to the increased noise protection provided by the roading corridor overlay and may potentially unduly burden the private property owners. Should the evidence that the railway line is or could impact the health of those occupiers beyond the current proposed protection become available in the future, a Plan Change would be the ideal solution to the issue with the rules taking effect from notification.

Should the Panel decide that the current information provided by KiwiRail is sufficient, or they choose a precautionary approach to the issue, I seek that the overlay does not impact more land than the roading corridor overlay.

³ It does branch away for short distances near settlements at Kumara, Camerons and Greymouth, but the Hokitika line runs adjoining State Highway network for most of the line.

Conclusion

Should the Panel or the addendum author require clarification on any matter, someone will be made available to answer any questions either in writing or via videoconference. Please contact Philippa Lynch at Poutini Environmental in the first instance at the following email address: Philippa.lynch@ngaitahu.iwi.nz .

Ngā mihi



Rachael Pull
Senior Environmental Advisor – Planning

APPENDIX A: Māori Purpose Zoned land adjoining the roading and rail corridors at Arahura



Figure 1: Te Tai o Poutini Plan zoning map of Arahura showing the rail and roading designations cross through the land