



RMA Form 5

Submission on Proposed Plan Change 5 to the Operative Ashburton District Plan

Clause 6 of the First Schedule, Resource Management Act 1991

To: Ashburton District Council

Note to person making submission:

The submission period for Proposed Plan Change 5 closes **5pm Friday 28th April 2023**.

Your submission (or part of your submission) may be struck out if the Council is satisfied that at least one of the following applies to the submission (or part of the 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.

1. Submitter Details

Please note: all fields marked with an asterisk () are compulsory:*

Name of submitter(s)* KiwiRail Holdings Limited

Submitter address* PO Box 593

City/Town* Wellington Postcode* 6140

Contact name (if different from above) Sheena McGuire

Contact organisation (if different from above) _____

Contact email address Sheena.mcguire@kiwirail.co.nz

Contact address (if different from above) _____

City/Town _____ Postcode _____

Contact phone number _____

Please Note that by making a submission your personal details, including your name and address, will be made publicly available in accordance with the Resource Management Act 1991. This is because, under the Act, any further submission supporting or opposing your submission must be forwarded to you as well as to the Council.

While all information in your submission will be included in papers which are available to the media and public, your submission will be used only for the purposes of the Plan Change Process.

2. Trade Competition Declaration*

Part A

I could not gain an advantage in trade competition through this submission. (If you tick this box please proceed straight to Section 3 of this form).

OR

I could gain an advantage in trade competition through this submission. (If you tick this box please complete Part B).

Part B (please ~~strikeout~~ the following option that does not apply to you).

I **am / am not** directly affected by an effect of the subject matter of the submission that:

- (a) Adversely effects the environment; and
- (b) Does not relate to trade competition or the effects of trade competition.

Note: *If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.*

3. Hearing options*

Do you wish to be heard in support of your submission? *If you choose yes, you can choose not to speak when the hearing date is advertised.*

Yes No

If others are making a similar submission would you considered presenting a joint case with them at the hearing? *You can change your mind once the hearing has been advertised.*

Yes No

4. Submission Details *

Yes I am enclosing further supporting information to this submission form.

The specific provisions of the proposal that my submission relates to (please give details):

Please see attached letter.



Signature of Submitter (or person authorised to sign on behalf of submitter):

S. McGuire

Date: 28/04/2023

Note: *A signature is not required if you make your submission by electronic means.*

Please return this form no later than **5pm Friday 28th April 2023**

- Scan and email it to info@adc.govt.nz (Subject Line: Proposed Plan Change 5)
- Post it to Ashburton District Council, Planning Team, P.O. Box 94, Ashburton 7740
- Deliver to Council Offices at 5 Baring Square West, Ashburton

24 April 2023

Ashburton District Council
PO Box 94
Ashburton 7740

By email to: info@adc.govt.nz

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR PLAN, CHANGE OR
VARIATION (FORM 5)
Ashburton District Council Plan Change 5 - Transportation**

NAME OF SUBMITTER: KiwiRail Holdings Limited (KiwiRail)

ADDRESS FOR SERVICE: Level 1
Wellington Railway Station
Bunny Street
PO Box 593
WELLINGTON 6140

Attention: Sheena McGuire

Ph: 027 227 7780

Email: Sheena.McGuire@kiwirail.co.nz

KiwiRail Submission on Proposed Plan Change 5 - Transportation

KiwiRail is the State-Owned Enterprise responsible for the construction, maintenance and operation of New Zealand's rail network. KiwiRail is also a Requiring Authority that holds railway purpose designations in District Plans throughout New Zealand.

KiwiRail's national railway network (which comprises of 3,700km of track, over 200 locomotives, 18,100 hectares of land and 1,350 modern and heritage buildings)¹ is a nationally and regionally significant infrastructure asset. The rail network is critical to the safe and efficient movement of freight and passengers throughout New Zealand, and forms an essential part of the national transportation network and the wider supply chain. New Zealanders have invested significantly in the rail network and it is a critical public asset.

The benefits of rail to the New Zealand economy were estimated in 2019 to be in the order of \$1.7 – 2.1 billion.² The economic significance of rail and the critical role it plays in reducing New Zealand's carbon emissions has been recognised by the Government through

¹ Half Year Annual Report 2022 and Unaudited Financial Statements for the Six Months Ended 31 December 2021 (KiwiRail, 2022) at page 5.

² The Value of Rail in New Zealand – Report for the Ministry of Transport (EY, Wellington, 2021) at page 8.



its continued investment in rail infrastructure. Transport modal shifts to more climate-friendly modes of transport, like rail, are critical to reduce carbon emissions. As a result, rail is experiencing a renaissance as evidenced by the significant investment being made by the Government to reinvigorate the railway network, demonstrating a strong and continued confidence in rail's current and future potential.

In the most recent budget, the Government allocated \$349 million to replace and modernise New Zealand rail assets,³ which has gone towards a number of major projects nationwide.

The designated corridor of the Main South Line (**MSL**) extends through the Ashburton District and is a key part of the KiwiRail network nationally. KiwiRail seeks to protect its ability to develop, operate, maintain and upgrade this line into the future.

KiwiRail understands that Plan Change 5 covers the following areas:

- Consequential amendments to various sections resulting from the implementation of the National Policy Statement on Urban Development;
- Provision of mobility parking and cycle parking standards;
- Provision for the assessment of high trip generating activities; and
- Updates to the Roding Hierarchy tables in the Transportation section.

Whilst the changes proposed primarily relate to parking, high generating activities and the roading network, KiwiRail has reviewed the proposed plan change documents. KiwiRail broadly supports the plan change however, seeks the inclusion of a definition for 'Transport network' which includes both the rail and roading network. The term 'Transport network' is used throughout chapter 10 including in new provisions relating to high traffic generating activities. Such activities can have an impact on the road and rail networks and therefore KiwiRail considers it appropriate to define the transport network to make this clear.

Relief sought:

Include the following definition:

Transport Network

Transport networks and operations in the Ashburton district of national or regional significance including:

- a) State highways;**
- b) Arterial roads;**
- c) Rail networks and systems; and**
- d) The region's core public passenger transport operations.**

Regards,



Sheena McGuire
RMA Advisor
KiwiRail Holdings Limited

³ Wellbeing Budget 2022 – A Secure Future (New Zealand Government, Wellington, 2022) at page 82.



