

9 May 2017

TImaru District Council PO Box 522 TIMARU 7940

Email: gmssubmission@timdc.govt.nz

Dear Sir/Madam,

## KiwiRail Submission on the 2045 Draft Growth Management Strategy

Thank you for the opportunity to submit on the Timaru District Council 2045 Draft Growth Management Strategy (Strategy). 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 operating rail freight and long distance passenger services within New Zealand.

KiwiRail Holdings Limited is also the Requiring Authority for the designated corridor of the Main South Line within the Timaru District. KiwiRail therefore has an interest in protecting its ability to continue to operate, maintain and enhance this nationally significant network into the future. The Main South Line rail network carries freight services using diesel locomotives.

Train movements through the District in the last four financial years are outlined below:

Financial Year	Total
2012	3425
2013	3407
2014	3450
2015	3061
2016	3367

The commentary below is in relation to the Strategy as published by Council in April 2017 for submissions.

#### Part A: Vision and Principles

KiwiRail support the Strategic Directions at A:2.3, particularly those in relation to Landscapes and Amenity (point ii); Transport (all); and those on Infrastructure (points i and ii(d)).

The only change KiwiRail suggest on these Strategic Directions is to include an element of practicality in Strategic Direction [2] Landscapes and Amenity (ii), an option being to word it improve amenity and design particularly in urban areas where practicable; and....

KiwiRail note that at number of the areas where growth is identified as possible within the Strategy have the rail line passing through them, including Timaru, Temuka, Winchester and

Pareora. In all instances, improving amenity around the rail corridor may not be possible for public safety and rail operational reasons. Landscaping needs to be managed to not interfere with trains as vegetative material on the track can result in derailments, but also to not impede sightlines from the rail corridor to level crossings and vice versa.

#### Part D: Basis for the District's Growth

The Basis for Growth discussions, and supporting issues discussions, are all supported by KiwiRail. KiwiRail support Council seeking to build resilient communities, looking to ensure that development is safe and accessible, and that the right housing is provided in the right locations. KiwiRail also support development that is connected and resilient, that is integrated with infrastructure and that incompatible activities are separated.

The only suggested change is in relation to the Table at D:1.5, under the Issue discussion relating to the Strategic Direction on Transport, on page 37, where the fifth bullet point references the strategic transport infrastructure networks however rail is omitted from the list. KiwiRail support consistent recognition throughout the Strategy for the rail network as a strategic piece of infrastructure within the District, alongside the state highways, Port of Timaru and Timaru Airport.

# **Part E: Strategy Framework**

The general thrust of this section of the Strategy is supported by KiwiRail, including the Directives and the Actions tables.

Those aspects specifically supported as relevant to rail activities include: Directives – Landscape and Amenity 5 and 6 and Action A2.5 in Table 3; Directive – Building Resilient Communities 3; and Directives – Infrastructure 1, 4, 5 and 6 and Action A8.4 in Table 10.

Specifically focusing on the Transportation discussion at E:2.7, the general discussion in the Overview and Explanation is supported, however KiwiRail would like to see rail discussed in the last paragraph on the left hand column of page 56. Rail, like roads, the port and the airport, represents significant investment, contributes to the economic returns of the District and is unable to completely internalise its adverse effects. The discussion is written in a way that the transport infrastructures listed are the only ones for which these elements arise, rather than the enabling recognition for other infrastructure as well.

Directives – Transport 1, 2, 3 and 4 are all supported as proposed. Action A7.2, A7.5 and A7.6 are supported as proposed, specifically recognising that KiwiRail is a support agency identified in A7.2 and A7.6. Likewise, KiwiRail support the recognition of rail as strategic infrastructure at Action 8.5. KiwiRail welcome the opportunity to be involved for future planning, and to assist Council wherever possible.

Similarly KiwiRail would support a reference to rail in the Support Agency column for A9.4 and A9.5 in Table 11 listing the Rural Actions. Similarly to NZTA, there are reverse sensitivity effects that arise with the rail corridor and noise sensitive activities being developed nearby.

### Part G: Implementation and Monitoring

Inappropriately located and designed development relative to the rail corridor, can result in increased safety risks in relation to the rail network as well as reverse sensitivity effects predominantly in relation to noise and vibration. Mitigation for these can be achieved through

setbacks from boundaries for buildings, and noise and vibration mitigation standards for buildings containing noise sensitive activities being included within the District Plan.

While the Strategy is not a District Plan, it is noted that section G.1.1.c outline's the Strategy's intent to influence future District Plan reviews. Therefore KiwiRail support the provisions within the Strategy as relevant to ensuring appropriately located and designed development in relation to rail.

In the event that the Council have any queries in relation to KiwiRail operations and activities, or on the comments within this submission, we are available to respond as required.

Regards,

Rebecca Beals

RMA Team Leader

**KiwiRail** 

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