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Kapiti Coast District Council
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By email to: submissions@kapiticoast.govt.nz and tracy@haysonknell.co.nz

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL TO ESTABLISH AND OPERATE A 24 HOUR SERVICE STATION AT 3 KAPITI ROAD PARAPARUMU

NAME OF SUBMITTER:

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KiwiRail Submission on the proposal to establish and operate a 24 hour service station at 3 Kapiti Road, Paraparaumu

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 Holdings Limited is also the Requiring Authority for land designated "Railway Purposes" (or similar) in District Plans throughout New Zealand.

The North Island Main Trunk line (NIMT) which is used for freight services is located immediately adjacent to the eastern boundary of the site. The NIMT is also used by Metlink to provide commuter services and KiwiRail to provide long distance passenger train services.



It is also noted that the KiwiRail designation for the NIMT extends across the application site along the eastern boundary between the Paraparaumu Station building and Kapiti Road in both the operative and proposed plans.

This corridor is a key part of the railway network and KiwiRail seeks to protect its ability to operate, maintain and enhance the corridor into the future. Safety is a key concern for KiwiRail, so ensuring level crossing risk is appropriately addressed is increasingly important as sites immediately adjacent to the rail corridor are developed.

Submission

Designation

The resource consent application makes no reference to, or commentary on the fact that part of the application site is subject to a designation for Railway purposes. There is also no discussion on the impacts that this may have on the application or recognition of the requirement for works within the area subject to the designation being subject to s176 approval from KiwiRail as the Requiring Authority. KiwiRail is in principle not opposed to the potential provision of the leased parking in the area of the application site that is subject to the designation. However, the correct processes need to be followed to ensure that the impacts of the proposed car parking on KiwiRail interests and operational requirements can be appropriately assessed and considered, including the future implications in the event that the designated area is used for railway purposes.

The applicant is reminded of the requirement to engage with KiwiRail and to obtain s176 approval for the proposed leased carparking before works commence on the site.

Transportation Effects

The effects of the proposal have been assessed via the following three documents

- the transportation assessment undertaken by Harrison Transportation dated July 2018;
- the amended assessment (dated October 2018); and
- an addendum (dated 28 November 2019)

which were provided following the review of the transportation assessment by Beca and a s92 request for further information.

In relation to KiwiRail's interests, the following is noted from the transport assessment information provided:

- The vehicles per day is anticipated to be using the Kapiti Road access is approximately 324 per day with a peak hour rate of 33 per hour.
- The users of the leased parking are likely to use the Kapiti Road entrance unless regular users become frustrated by potential delays and then the users are likely to use the Amohia Road access which will allow a left turn in manoeuvre.
- The leased carparks are likely to be used for all day parking rather than high turnover parking.
- The assessment acknowledges that the sightlines to the east are through the pedestrian fences for the railway crossing.

The following comments are made regarding the transportation assessment:



- The leased parking is likely to generate a peak demand in the morning and afternoon as it is likely that the carparking will be used by commuters which will also coincide with the peak timetable for the commuter trains.
- The use of the parking by commuters, and likely associated behaviors and the potential effects of this in relation to the Kapiti Road access and the proximity of the access to the level crossing has not been assessed in relation to the impacts of this on the level crossing.
- The Traffic Assessment notes in relation to the proposal that all movements at the Kapiti Road access are expected to operate efficiently with low delays, negligible queues and a high level of service.

Of note in the transportation assessment is that although the presence of the level crossing is noted and there are a number of photographs of it, there appears to have been no specific consideration given to level crossing risk and whether this might change as a result of the proposed activity and associated traffic movements on the application site. KiwiRail is keen to ensure that this is considered during the resource consent process as it would confirm whether the level crossing safety is adequate for the additional traffic and/or whether it requires mitigation.

KiwiRail uses an assessment process called the Level Crossing Safety Impact Assessment (LCSIA) to assess risk. A key component of the process is the Level Crossing Safety Score (LCSS). Together with the traditional ALCAM level crossing risk model score, the LCSS also looks at three additional data sources associated with crash risk: historical crash and incident data, safety observations made by locomotive engineers and road controlling authority engineers, and a more detailed site assessment of the impact of the existing level crossing layout on traffic/cyclists/pedestrians and their interaction with it and the surrounding transport network.

KiwiRail considers that an LCSIA should be completed for this level crossing as it may be affected by traffic flows generated by the proposed development. The LCSIA will determine whether mitigation (if any) is required as a result of the proposal.

Relief sought

In order to ensure that the nature of the effects are understood, and can therefore be adequately mitigated through conditions in the event consent is granted –

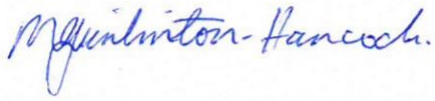
1. KiwiRail requests Council require the applicant to undertake a LCSIA prior to the application proceeding to a hearing so that the effects of the proposal in relation to and on the level crossing can be fully understood.
2. If as a result of the LCSIA mitigation measures are required as a result of the proposal, KiwiRail seeks for the applicant to amend the application to include those mitigation measures as part of the proposal.

KiwiRail could not gain an advantage in trade competition through this submission.

KiwiRail wishes to speak to our submission and will consider presenting a joint case at the hearing with other parties who have a similar submission.



Regards



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KiwiRail

