

**BEFORE A BOARD OF INQUIRY
EAST WEST LINK PROJECT**

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

of notices of requirement for designations and
resource consent applications by the New Zealand
Transport Agency for the East West Link Project.

**SUMMARY OF EVIDENCE OF DAVID GORDON FOR KIWIRAIL HOLDINGS
LIMITED**

7 AUGUST 2017

**Russell
McLeagh**

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Summary of evidence

1. KiwiRail Holdings Limited ("**KiwiRail**") is responsible for the rail network, which is nationally and regionally significant infrastructure. In certain parts of New Zealand, the rail network has been in place for well over 100 years, and is crucially important to the economic and social development of the areas it services. KiwiRail's principal business is freight, but it is also increasingly involved in the delivery of public transport in Auckland. Both these uses result in large numbers of train movements throughout the region. As such, KiwiRail has developed a close working relationship with Auckland Transport, the Transport Agency, and Auckland Council in the delivery of its services.
2. KiwiRail supports the East West Link and the preferred alignment, subject to adequate conditions to ensure adverse effects on the rail corridor are avoided, remedied or mitigated.
3. Over the past 10 years, KiwiRail has undertaken a number of measures to deal with additional demand that has been accelerated as a result of the patterns of growth within the Auckland Region.¹
4. Rail, unlike roads, has very limited flexibility in relation to alignment, grade and curvature, and KiwiRail is constrained in its ability to expand or identify alternative sites for its infrastructure. As such, KiwiRail's existing designations are pivotal to its operations, and its ability to safely operate, maintain, and upgrade its network within its current footprint is paramount.
5. It is imperative to KiwiRail that development proposed near (or, as in the case of the East West Link, over) its infrastructure is sensitive to those factors, and avoids or mitigates any adverse effects on the safe and efficient operation of the rail network. Development proposals near the rail network need to work within the constraints that the network presents, as it is extremely difficult, costly, and disruptive to require KiwiRail to alter its operations to accommodate new activities.
6. The East West Link crosses above KiwiRail's Southdown site and runs over the North Auckland Line alignment.² The existing connection to the Southdown inland port, the junction with the Westfield depot, and the existing alignments of the North Auckland Line and North Island Main Trunk are essential parts of the KiwiRail network in Auckland, both in respect of moving freight within and outside of Auckland, and the passenger services that operate on them. The proposed alignment of the East West Link over those existing KiwiRail assets represents the least disruptive outcome, if the East West Link is to be constructed.

¹ See section 4 of my evidence-in-chief dated 10 May 2017.

² As shown at Figures 1 and 2 in my evidence-in-chief.

7. In relation to the East West Link, KiwiRail has four key considerations:³
- (a) Safety –KiwiRail actively manages access to the rail corridor through the Permit to Enter process as a means of managing safety. In KiwiRail's view, the proposed alignment reflects an option that preserves the safety of its network, and those who work within it. KiwiRail will necessarily need to remain involved during the detailed design phase to ensure that adequate provision is made for the safety of all rail participants. KiwiRail's Permit to Enter process, in addition to its role as primary designation holder, are sufficient to address safety considerations.
 - (b) Operation of the rail network –The East West Link will require the removal and replacement of a substation, which is one of only two in Auckland that provides electricity to the passenger rail network in Auckland. The relocation of this substation must provide for the same (or improved) consistency and continuity of electricity supply. A condition has been put forward in this regard that KiwiRail supports, which Ms Beals will discuss further.
 - (c) Maintenance - Rail is a 24 hour a day, 7 day a week operation. As such, maintenance opportunities (without causing significant disruption to freight and passenger services) are limited. Protecting the ability to operate, maintain and upgrade the rail network as and when required without undue restriction is key to providing a safe and efficient rail business, and KiwiRail will work closely with the Transport Agency to ensure this. Significant financial implications arise from closing a line even for a short period of time, which need to be balanced against the benefit gained from the works proposed. The proposed alignment adequately addresses this consideration as well.
 - (d) Upgrading - Upgrades as the result of technology changes and growth in freight demand are likely to occur in the foreseeable future, and therefore ensuring the East West Link protects the ability for this change and growth to be realised is paramount. The proposed alignment, developed, from KiwiRail's perspective, through a comprehensive consultation process, avoids future pinch-points and best achieves the future development of the network within existing designation boundaries.
8. KiwiRail will continue to engage with the Transport Agency during the detailed design phase, if the project is approved.

³ Further detail is provided in section 7 of my evidence.

Matters arising since facilitation or conferencing

9. No changes are required to my evidence following facilitation or conferencing, and I confirm that the conclusions set out in my evidence remain true and correct to the best of my knowledge.
10. Matters arising since the exchange of evidence will be addressed by Ms Beals.

DATED 7 August 2017

David Gordon
Group General Manager, Asset Management and Investment