

22 July 2021

The Commissioner, Plan Change 66
C/- Selwyn District Council
2 Norman Kirk Drive,
Rolleston

Liz White
C/- Liz White Planning
132 Guthries Road
Christchurch 8051

Dear Sir,

RE: Plan Change 66 – Lyttelton Port Company Submission

We are in receipt of the Council Officer's Section 42 Report dated 15 July 2021, and Minute 1 advising of the circulation of submitter evidence to Plan Change 66 no later than Friday 30 July 2021. The Hearing is scheduled 9 and 10 August 2021.

Lyttelton Port Company Limited (LPC) is a submitter on the Plan Change (PC66-0008).

On behalf of Lyttelton Port of Christchurch (LPC) we advise support for those aspects of the recommendation of the Section 42A Report to accept LPC's submissions on PC66.

LPC supports the proposed amendments to PC66 as detailed in Section 8 of the Section 42A Report. Such amendments are consistent with the advice LPC has received from its Planner - Mr Matt Bonis, and Traffic Engineer – Mr Andrew Metherell.

The recommended provisions seek to:

- **Preclude Noise Sensitive Activities as defined in the Operative Selwyn District Plan from locating within 80m of the interface with LPC's operations at Midland Port.**
- **Preclusion of the operation of activities facilitated by the rezoning, until such time as a northward access is provided from Midland Port site and a legal road within the site.**

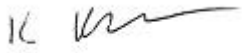
In terms of the former, the reasoning provided by the Reporting Officer is agreed [Section 42A Report, 64].

In terms of the later, it is agreed that the ODP would not need to be modified to notate an agreed required vehicle access connection to Midland Port as LPC can advise that a specific location has not yet been identified. LPC also consider that transport effects associated with such a connection would appropriately be managed through subsequent consenting and engineering approval [s42A Report, 42]. It is not considered necessary that a specific location for connection to Lot 2 DP 475847 is required on the ODP [s42A Report, 137,(c)(i)] with a simple cross reference to proposed Rule 22.9.8 on the ODP being sufficient.

Given that there is agreement between LPC and the Section 42A Report writer on the outcome of LPC's submission, LPC does not intend to present evidence or appear at the Hearing of PC66. On behalf of LPC I have also appended a letter of general support to the RIDL proposed Plan Change which was requested by the Proponent, and I understand will also be attached to their bundle of evidence.

Should you have any questions or concerns regarding the amendments recommended in the Section 42A Report with respect to those matters raised in LPC's submission, LPC would be willing to assist by attending the Hearing to address the Commissioner on any points arising, as advised.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K Kelleher', with a stylized flourish at the end.

KIM KELLEHER

Head of Environment and Sustainability

Attachments

Letter from LPC to Rolleston Industrial Developments Limited dated 21/07/21

21 July 2021

Rolleston Industrial Developments Limited
Attn. Tim Carter

Dear Tim,

RE: Plan Change 66 – MidlandPort Growth Potential

Further to the Lyttelton Port Company (LPC) submission on Plan Change 66 that addressed specific environmental effects potentially arising from the proposal, we write in general support of the rezoning of additional industrial land immediately adjacent to the MidlandPort at Rolleston.

Background

Lyttelton Port Company (LPC) own and operate the MidlandPort, located within the Business 2A zone at Rolleston. MidlandPort became operational in June 2016. The rail connection with the Port improves container freight efficiency, and decreases travel time and freight costs for customers. It also reduces road congestion by removing trucks on the Port route.

MidlandPort is strategically positioned to offer connectivity to all transport modes throughout the South Island. Combined with our extensive facilities and neighbouring developments, a supply chain that includes MidlandPort can be optimised to ensure that containers are moved to and from ports at the lowest cost. Features of MidlandPort's location include:

- (a) Next to the main trunk rail line and State Highway 1, within 1km of the end of the new Southern Motorway Stage 2.
- (b) Direct access to Lyttelton Port via a dedicated rail shuttle.
- (c) Connections to a large number of shipping services and shipping lines, offering direct calls to Australia, Asia, North America and Europe.
- (d) Rail access to all points West and South of Rolleston.
- (e) Rolleston is at the heart of the region catering for significant amounts of both export and import cargo.

During the formative stages of development of MidlandPort, LPC spent an extensive amount of time researching potential locations on the South side of Christchurch that were suitable for an inland port. Rolleston was a logical location for a Lyttelton inland port due to its strategic position at the intersection of South Island's major freight arterials, the South Island main trunk railway line, the Midland railway line (railway to the West Coast), State Highway 1 and Christchurch's new Southern motorway which is due to open in 2019/20.

LPC looked at a number of potential sites in and around Rolleston in which we could possibly setup an inland port. The MidlandPort site was selected as it was the site where LPC could establish the longest railway siding with direct access to the main South Island railway line. In addition, the MidlandPort site was positioned alongside a large area of vacant industrial land that provided for the development of large freight and logistics providers immediately alongside the Port's boundary. This provided benefits to the Port and our key freight/logistics partners in terms of container handling efficiencies and reduced transportation times and costs. It also allows for reduced reliance on local roads as containers can be transported without needing access to the local road network.

The total length of railway siding that that can be accommodated on the current MidlandPort is 540m which allows us to load 30 railway wagons.

Capacity for Growth

We support Rolleston Industrial Developments Limited's (RIDL) submission to include the 27ha of land shown on the attached plan to be earmarked for future industrial development.

Our containerised cargo is forecast to increase from about 370,000 teu in 2015 to over 1 million teu by 2041. MidlandPort is part of our long term plan which makes sure we can meet this demand and to ensure we can handle bigger vessels and the increased volume that is expected over the next 20 – 30 years.

The site development, supporting infrastructure and activities were established subject by Resource Consent RC155101. It is these activities and the site that forms the basis for the Port Zone (PORTZ) and associated Noise Control Overlay within the recently proposed Selwyn District Plan. LPC is supporting the PORTZ through the current district plan Hearings process.

If the RIDL land is rezoned for industrial use, it does provide an opportunity for LPC to extend the railway line by a further 563 metres, allowing the possibility of longer more efficient trains. The Plan Change 66 site is the only site that provides such an opportunity. There would also be efficiencies in terms of enabling further areas of an extended rail siding for the contemporaneous development of large freight and logistics providers and optimisation of freight handling.

Reverse Sensitivity and Incompatible activities

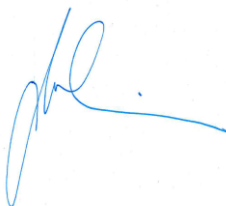
Under the current Selwyn District Plan zoning, the MidlandPort facility abuts Rural Zone on its eastern and northern boundary. The larger the extent of adjoining Rural Zone, the higher the potential for reverse sensitivity effects to arise from neighbouring rural property owners, for example in regard noise from the Port operations. The proposed Selwyn District Plan introduces a Noise Control Overlay to avoid such reverse sensitivity effects.

However, a rezoning of the Plan Change 66 site to Business 2A (General Industrial Zone) would provide a buffer to the rural zone to the north. It is considered that a rural environment would likely have amenity expectations and a quality of the environment that is less compatible at the interface with Midland Port operations.

Road Transport Issues

In response to concerns raised by LPC in its submission on PC66, further assessment and modelling of the road network, MidlandPort's interface with that network, and potential transport impacts arising from PC66, was undertaken by Rolleston Industrial Developments Ltd. In discussions with the Proponent of the Plan Change, it is understood that PC66 has been amended by the Proponent to enable an alternate egress from the Port to avoid congestion at the Jones Road access. This alternate access (via PC66) also will provide valuable resilience should any incidents occur on Jones Road (such as a crash or road maintenance) that would otherwise restrict access for the Port. LPC is very supportive of this aspect of the Plan Change.

Yours sincerely



MIKE SIMMERS

General Manager, Infrastructure and Property