



29 November 2018

Greater Christchurch Partnership  
PO Box 73012  
Christchurch 8154

Email: [ourspace@greaterchristchurch.org.nz](mailto:ourspace@greaterchristchurch.org.nz)

To whom it may concern at Greater Christchurch,

**RE: LPC SUBMISSION: OUR SPACE 2018-2048 GREATER CHRISTCHURCH  
SETTLEMENT PATTERN UPDATE**

---

**Hearing**

Lyttelton Port Company (LPC) wishes to be heard in support of this submission and its preferred location is Christchurch.

**Overview**

LPC generally supports the direction of the Our Space 2018-2048 Greater Christchurch Settlement Pattern Update (Update). There are however some matters around the urban limit and transport associated with access to the port and inland ports that LPC considers needs to be considered as part of this process and the forthcoming review of the Canterbury Regional Policy Statement (CRPS).

**Lyttelton Port Company**

Within the Greater Christchurch area LPC operates three key sites – the Port of Lyttelton, City Depot in Woolston, and Midland Port at Rolleston. LPC employs over 500 employees at these facilities.

Lyttelton Port Company Limited  
Private Bag 501, Lyttelton, 8841,  
Christchurch, New Zealand  
Phone: +64 3 328 8198  
Fax: +64 3 328 7828  
Email: [enquiries@lpc.co.nz](mailto:enquiries@lpc.co.nz)  
Web: [www.lpc.co.nz](http://www.lpc.co.nz)

LPC serves a wide range of importers and exporters at the Port itself with full shipping services 24/7, all year round. LPC own and operate Lyttelton Port, which is by far the most significant port in the South Island in terms of total tonnages of cargo, number of containers handled, the value of exports and the value of imports. By volume, the Port accounts for 30.7% of South Island seaports' overseas exports and 45.1% of overseas imports. By value the Port handles 35.8% of the South Island's seaports' exports and 70.0% of the South Island's seaports' imports.<sup>1</sup> It is recognised as a "lifeline utility"<sup>2</sup> and "significant infrastructure"<sup>3</sup> at the local and national level.

Trade through Lyttelton Port has grown considerably across both containerised and general cargo. The volume of containerised and general cargo through the port has increased by 17.8% over the period 2010 to 2018.<sup>4</sup> In 2017 the port handled 420,496 TEU (twenty foot equivalent) containers, an increase of 7.3% on 2016 and an increase of 80.9% since 2010.<sup>5</sup> LPC expects this growth to continue into the foreseeable future, as a result of:

- Growth in Canterbury and South Island export and imports; and
- Greater use of Lyttelton Port instead of other South Island ports as shipping companies continue the trend of using larger container ships and reducing services to some ports.

LPC forecasts ongoing growth for its container terminal to reach well over one million twenty-foot equivalent units (TEUs) by 2041. Non-containerised volumes of export and import trades are expected to continue growing but not as fast as containerised cargo.

---

<sup>1</sup> For the year ending 30 June, 2018. Source: Statistics New Zealand Infoshare, Overseas Cargo Statistics ([www.archive.stats.govt.nz/infoshare](http://www.archive.stats.govt.nz/infoshare))

<sup>2</sup> See Schedule 1 of Civil Defence Emergency Management Act 2002.

<sup>3</sup> See New Zealand Government's 2011 National Infrastructure Plan and Christchurch City Council's Christchurch Transport Plan 2012-42.

<sup>4</sup> For years ending 30 June. Source: Statistics New Zealand Infoshare, Overseas Cargo Statistics ([www.archive.stats.govt.nz/infoshare](http://www.archive.stats.govt.nz/infoshare))

<sup>5</sup> Source: [www.championfreight.co.nz/largest-nz-ports](http://www.championfreight.co.nz/largest-nz-ports)

City Depot located on Chapmans Road, Woolston, provides an inland container storage and repair facility in close proximity to the Port and is the South Island's largest container facility. It also has a rail siding to allow transfer of cargo.

Midland Port provides for the receipt, storage, packing, devanning and cross docking of containers and includes direct rail connection to the 11 shipping lines and 8 shipping services that access the Port.

At present the largest redevelopment in the Port's history is underway with a major focus being to move a significant part of the operations east to allow for growth. These developments are enabled by the Lyttelton Port Recovery Plan a significant document in the recovery of Greater Christchurch post the earthquakes. The Port redevelopment will ensure forecasted freight increases are able to be catered for and continue to support customers' requirements and the growth within the Canterbury region.

## **Submission Points**

LPC wishes to make the following submission points:

### **1. Strategic infrastructure**

LPC supports the reference in the Update on page 5 to Lyttelton Port being recognised as important strategic infrastructure which is to be protected. The presence of strategic infrastructure also places constraints on where development can occur and in particular developments which are sensitive to the effects of Port operations.

### **2. Urban Limits**

LPC has obtained the necessary consents to undertake significant reclamation at the Port as the key factor which will enable the expansion of the Port to the east. In order to ensure that appropriate port operations zoning is able to be applied to this area and/or activities undertaken on the reclaimed land as it is being built over a long time horizon, the urban limits boundary needs to be

updated to incorporate the new areas of land which will be reclaimed and place them within the urban limits in the same manner as of current Port land. The Plan attached as **Appendix 1** identifies the area concerned and is consistent with the Lyttelton Port Recovery Plan.

LPC notes that the land adjoining its Midland Port facility to the east and north remains inside the Project Infrastructure Boundary but has not been identified as a Business greenfield priority area. LPC's point here is to emphasise the need to ensure that the constraints which arise from strategic infrastructure are recognised and sensitive activities are prevented from locating near Midland Port.

### **3. Transport**

LPC's primary concern is that the Update is relatively silent, aside from two Rapid Transit Corridors, on improvements to the transport network over the next 30 year period. In particular LPC has a specific interest in ensuring the movement of freight to and from its three facilities is not hampered by increased traffic growth and distribution as a result of urban development.

The Update emphasises that *“an important part of managing the transport network is to ensure that freight can be moved efficiently to and through Greater Christchurch”* and that *“this will require effective management of congestion on the main freight routes”*. It is within the context of this statement that the following points are made:

#### Key Road Freight Routes

For clarity LPC has provided a Map in **Appendix 2** that highlights key road freight routes that are utilised. LPC considers that the key road freight routes shown in Appendix 2 should be included in the Update as strategic freight routes. In particular, the Update should acknowledge the need for significant upgrades along the State Highway 76 route within the 30 year horizon, specifically the upgrading of the Brougham Street section of that route. LPC considers Brougham Street is currently a major point of congestion for freight to the Port and understand that some drivers have begun taking alternate routes including around the base of the Port Hills; which is considered to be undesirable.

The increasing Brougham Street congestion was identified in the 2014 Greater Christchurch Freight Study by Aurecon as a future capacity constraint and threat, with roading widening and grade separation of key intersections suggested as solutions to ensure the efficient distribution of freight and improve local access crossing of the corridor. LPC acknowledges the current NZTA/Christchurch City Council consultation process on this route and considers that the outcomes of this need to be built into the Update.

The Aurecon report also identified the duplication of the Lyttelton Tunnel as a long-term medium priority. LPC consider this, or a freight only tunnel, may well be needed by around 2040 and should be signalled in the Update.

The imminent re-opening of the Sumner Road via Evans Pass Road will once again mean this route is used for freight traffic associated with hazardous substances and LPC considers this needs to be expressly recognised.

#### Rail

LPC considers rail to be an important component of the freight network in particular the portion of the network shown in Appendix 2, and will become increasingly so over the next 30 year period. There are a number of constraints on the rail network in the Christchurch area which have the potential to impact of freight movements that LPC consider should be highlighted in the Update.

These include:

- The ability to turn to the northern line when leaving the port. This will become of increased importance if an inland port is created to the north of Christchurch as freight from North Canterbury increases.
- Double tracking between Islington and Rolleston. With increased freight movement out of Midland Port at Rolleston coupled with those movements already on the route from the south and from the Midland line this part of the route is likely to become increasingly congested over the next 30 year period. Double tracking of this section was highlighted in the Aurecon report as a medium term medium priority measure.

- Traffic congestion created at the shunting yards at Middleton on the Annex Road, Matipo Street and Whiteleigh Avenue rail crossings was highlighted in the Aurecon report as impacting on freight movements and deemed a long term high priority for grade separation. In particular the Annex Road crossing, was identified as a significant connector between the Christchurch South Motorway (from Brougham Road) to the western region of Christchurch, and will become detrimental to movements of freight and other vehicles if remedial action is not undertaken.

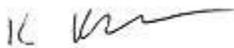
Rolleston Overpass

LPC supports the need for the roading overpass at Rolleston to be constructed in the short term to allow shunting at Midland Port to occur without having to interface with, and disrupt, traffic.

It is LPC's intention to provide more detailed information in relation to the above submission points at the future hearing; however, LPC would welcome the opportunity to discuss any aspects of this submission at an early opportunity should the Partnership wish to do so.

Finally, LPC considers that the Schedule of Future Work should involve consultation with owners / operators of Strategic Infrastructure such as LPC.

Kind regards,



Kim Kelleher  
Environment & Planning Manager  
Lyttelton Port Company  
**T:** +64 3 328 7983  
**M:** +64 27 298 1347  
**E:** [kim.kelleher@lpc.co.nz](mailto:kim.kelleher@lpc.co.nz)

Lyttelton Port Company Limited  
Private Bag 501, Lyttelton, 8841,  
Christchurch, New Zealand  
Phone: +64 3 328 8198  
Fax: +64 3 328 7828  
Email: [enquiries@lpc.co.nz](mailto:enquiries@lpc.co.nz)  
Web: [www.lpc.co.nz](http://www.lpc.co.nz)



# Appendix 1: LPC Land at Lyttelton Port



## Appendix 2: Key Road and Rail Freight Routes Utilised by LPC

