

Before an Independent Hearings Panel
appointed by Christchurch City Council

under: the Resource Management Act 1991

in the matter of: proposed Plan Change 14 (Housing and Business
Choice) to the Christchurch District Plan

and: **Lyttelton Port Company Limited**
Submitter 853

Statement of Evidence of Crystal Lenky (company)

Dated: 20 September 2023

Counsel: A M Lee (annabelle.lee@chapmantripp.com)
J M Appleyard (jo.appleyard@chapmantripp.com)

chapmantripp.com
T +64 3 353 4130
F +64 4 472 7111

PO Box 2510
Christchurch 8140
New Zealand

Auckland
Wellington
Christchurch



STATEMENT OF EVIDENCE OF CRYSTAL LENKY

INTRODUCTION

- 1 My full name is Crystal Charlotte Lenky.
- 2 I am the Head of Environment and Sustainability for Lyttelton Port Company (*LPC*). In this role I am responsible for delivering LPC's environmental and sustainability strategies and programmes across the business.
- 3 I hold a Bachelor of Science (Biology) from Coastal Carolina University, Master of Science (Biology) from Memorial University, and Doctor of Philosophy (Antarctic Studies) from the University of Canterbury.
- 4 I have 9 years professional experience, largely in construction environmental management and strategy. I have been employed at LPC since 2018.
- 5 I am authorised to give this evidence on LPC's behalf.

SCOPE OF EVIDENCE

- 5 I have been asked to comment on the relief sought by LPC in relation to the proposed Plan Change 14 (Housing and Business Choice) to the Christchurch District Plan (*PC 14*).
- 6 My evidence will address:
 - 6.1 Lyttelton Port;
 - 6.2 Managing port noise at Lyttelton; and
 - 6.3 Managing inland port noise at Woolston.

LYTTELTON PORT OF CHRISTCHURCH

- 7 Lyttelton Port of Christchurch is owned by LPC. The company is a wholly owned subsidiary of Christchurch City Holdings Limited, which is the investment arm of the Christchurch City Council (*Council*). LPC operates from three sites:
 - 7.1 Lyttelton Port;
 - 7.2 An Inland Port at Woolston (called CityDepot); and
 - 7.3 An Inland Port at Rolleston (called Midland Port).

- 8 Lyttelton Port is the South Island’s major deep-water port and is the international freight gateway for the South Island. Lyttelton Port is New Zealand’s third-largest container terminal by volume, after Port of Tauranga and Port of Auckland.
- 9 The Inland Ports are an integral and integrated component within LPC’s port infrastructure, containing road and rail interchange for empty containers and full containers. They enable LPC to better optimise container movements on and off the wharf and cannot be distinguished in a functional or operational sense from the remainder of Lyttelton Port activities.
- 10 PC 14 is relevant to Lyttelton Port and to the Inland Port at Woolston.
- 11 LPC’s landholding at the Lyttelton Port covers a total of some 163 hectares, extending from Magazine Bay in the west to Gollans Bay in the east. Lyttelton Port operates continuously, that is, 24 hours each day and 7 days per week.
- 12 The 17-hectare Inland Port at Woolston runs 24 hours, five and a half days a week and provides the following services:
- 12.1 Handling and storage of up to 10,000 TEU containers;¹
 - 12.2 All-weather container repair facility;
 - 12.3 Repair bays served by overhead gantry cranes;
 - 12.4 Container wash facilities; and
 - 12.5 A mobile repair unit.
- 13 The Woolston site has good access to the State Highway network and to the rail network via the 24-wagon rail siding.

MANAGING PORT NOISE AT LYTTELTON

- 14 The evidence of **Andrew Purves** outlines how the Christchurch District Plan manages noise from Lyttelton Port. In 2008 a Port Liaison Committee (*PLC*) was established to oversee the implementation of a port noise management plan and an acoustic treatment programme for houses affected by elevated levels of port noise.
- 15 The PLC also reviews any complaints about port noise and any actions to prevent a recurrence of the complaint.

¹ TEU is the standard unit for a twenty-foot container.

- 16 Although I have only been on the PLC as a LPC representative in the last two years, the PLC has functioned well and has in fact broadened its terms of reference to cover other issues of relevance to Lyttelton Port and the community.
- 17 The acoustic treatment work, at cost to LPC, involves carrying out the necessary insulation, glazing, cladding and ventilation of habitable spaces to achieve the desired internal design sound level. Twenty-nine dwellings are eligible for acoustic treatment with seventeen having been completed and six in progress. I note that the uptake of acoustic treatment has been affected by the significant earthquake repair issues that property owners have faced over the years.
- 18 Despite the on-going management of port noise and the acoustic treatment programme overseen by the PLC, ports are inherently noisy facilities with ships at berth and associated cargo handling operations.
- 19 Therefore, LPC strongly supports the adoption of the Lyttelton Port Influences Overlay and the associated provisions in PC 14 to avoid reverse sensitivity effects on LPC.

MANAGING INLAND PORT NOISE AT WOOLSTON

- 20 LPC obtained a resource consent from the Council in 2009 to enable its CityDepot facility to better integrate with the container terminal at Lyttelton Port – a copy of the consent is attached as **Appendix 1** to **Mr Purves'** evidence.
- 21 As required by the consent, LPC implemented a noise management plan that involves:
- 21.1 Managing noise at source;
 - 21.2 Selecting machinery with lower noise emissions and making sure the machinery is well-maintained;
 - 21.3 Controlling the noise between the source and sensitive receiver positions with acoustic barriers (containers are used); and
 - 21.4 Management techniques at source to minimise the noise output (driver guidelines and training).
- 22 Managing noise at source includes:
- 22.1 Trains entering and leaving CityDepot at low speeds to minimise noise with engines only attached at the north end of the train;

- 22.2 Ensuring containers are locked in place prior to being picked up and moved by a forklift to avoid bangs; and
- 22.3 On-going paving or resealing of areas to prevent rattling of machinery.
- 23 A community liaison group was established after consent was granted but was discontinued after the 2010 earthquake sequence due to more pressing issues for the local community. LPC did try to reactivate the group several years ago but there was no interest, noting a number of original owners have moved on since the earthquake sequence. LPC also engages independent experts to regularly monitor noise at CityDepot: the operation to date has a consistent record of compliance with the conditions of consent.
- 24 As noted earlier, the Inland Ports are an integral part of LPC's operation and LPC is currently carrying out an upgrade project at CityDepot, which involves a budget of over \$4 million. Half of this cost relates to new paving and associated drainage works which will improve the operation and should assist in reducing noise emissions.
- 25 Given the importance of CityDepot to the wider container handling operation, LPC seeks, and I endorse based on my experience in my role, the proposed acoustic treatment standards contained in the evidence of **Mr Purves**. These are intended to help avoid future potential complaints from night-time inland port noise.
- 26 I note that LPC has decided, on balance, not to pursue any rules limiting the density of residential development (that would otherwise be enabled through PC 14) on the opposite side of Port Hills Road to CityDepot in this instance. This was a deliberate decision in the specific context of PC 14 in this location at this time and it should not be taken to signal a broader LPC position in relation to the use of land surrounding its facilities.

Crystal Lenky

20 September 2023