

28 August 2015

Draft Lyttelton Port Recovery Plan
Canterbury Earthquake Recovery Activity
Private Bag 4999
Christchurch 8140

Via email: info@cera.govt.nz

Dear Sir/Madam

Draft Lyttelton Port Recovery Plan - written comments

Thank you for the opportunity to comment on the Draft Lyttelton Port Recovery Plan (LPRP). The Christchurch City Council (Council) has been a partner in the development of the Draft LPRP and has provided feedback in the various stages of its development.

The process undertaken by Environment Canterbury to develop the Draft LPRP has been collaborative, robust and thorough. The result is a Draft LPRP that the Council is pleased with, addresses most of the concerns raised during the process and provides a balanced recovery framework for Lyttelton Port. Therefore our comments are limited to relevant actions and minor timing matters as outlined in Attachment A.

The Council supports the vision, goals, the Plan and the overall recovery framework of the Draft LPRP as notified by the Minister. The Council is committed to all relevant actions it has responsibility for and participation in to achieve the vision and goals of the Draft LPRP.

The key Council comment relates to the timing for Action 13: Quantitative Risk Assessment of bulk liquids storage facilities. The Council supports Action 13 and is committed to progressing this in a timely manner. However the Council is concerned that a six month time frame does not sufficiently take into account the full process that will be needed to complete a Quantitative Risk Assessment involving a number of parties. It is suggested that the time frame is amended to nine months to provide sufficient time to fully account for the process.

The Council is disappointed that the draft LPRP does not provide the certainty that the community sought in relation to long-standing issues related to Norwich Quay and the location of the ferry terminal. However the conclusion reached by the Hearings Panel and Environment Canterbury in the Draft LPRP is acknowledged.

The Council would like to congratulate Environment Canterbury and other partners for the positive way in which the process has been undertaken in developing the preliminary draft, hearing and the final draft delivered to the Minister. Overall the Draft LPRP is a positive document that achieves the purpose of the Ministers Direction and provides a framework to facilitate recovery of Lyttelton Port.

Yours faithfully



Michael Theelen
Chief Planning Officer

cc the Lyttelton Port Recovery Plan Working Party

Attachment A: Christchurch City Council written comments on the Draft Lyttelton Port Recovery Plan

<p>What are the provisions of the draft Lyttelton Port Recovery Plan that your written comments relate to? Please state if you support or oppose each of these provisions</p>	<p>Why do you/ don't you support that provision?</p>	<p>What outcome do you want?</p>
<p>Vision and Goals</p>	<p>The LPRP vision and goals are balanced and include all the key elements of the recovery framework. They will provide a useful basis for all actions and recovery projects to be measured against.</p>	<p>Retain the vision and goals as notified</p>
<p>Action 3: Recovery framework - Proposed Christchurch Replacement District Plan and Appendix 3 - Amendments to the Proposed Christchurch Replacement District Plan</p>	<p>The provisions of the Specific Purpose (Lyttelton Port) Zone (in Appendix 3) provide an enabling framework for the recovery and growth of the Lyttelton Port in a timely manner. This will be achieved through a range of port and non-port related activities whilst managing potential effects of commercial development at Dampier Bay on Lyttelton township. In particular, the Council strongly supports the retention of Rule 21.8.2.2.1 P5 & P6 specifying floor area limits for retail and office activity as notified in the Draft LPRP.</p>	<p>Retain Action 3 and all provisions of Appendix 3 as notified</p>
<p>Action 4: Recovery framework - Banks Peninsula District Plan and Appendix 4</p>	<p>Makes relevant consequential amendments to the Banks Peninsula District Plan.</p>	<p>Retain Action 4 and Appendix 4 as notified</p>

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Action 7: Whakaraupo/Lyttelton Harbour Catchment Management Plan	<p>Support</p> <p>Provides a framework to undertake work on development of a whole of harbour management plan.</p> <p>The Council supports the action as currently worded as it provides the flexibility to establish the most appropriate process and governance structure to achieve the development of a catchment management plan, including the ability for the community to set the outcomes.</p>	Retain Action 7 as notified
Action 8: Transport Network - Memorandum of understanding Action 9: Transport Network - Pedestrian access across Norwich Quay	<p>Support</p> <p>Both actions will facilitate a collaborative approach to addressing matters in relation to transport network issues for Lyttelton related to the recovery plan. The Council has been involved in discussions with other partners to progress the drafting of the Memorandum of Understanding under Action 8.</p> <p>Both actions are essential elements in the Recovery Plan framework to achieve the goals.</p> <p>The Council does wish to express disappointment that the long standing issues</p>	Retain Actions 8 and 9 as notified

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	<p>in relation to Norwich Quay and its impact on the ability to connect to the waterfront have not been able to be resolved through the recovery plan process. These issues were well traversed at the hearing and the Hearing Panel report clearly outlines the issues, concerns and recovery matters. The Council accepts the conclusion reached by the Hearing Panel which is reflected in the Draft LPRP, however wishes to acknowledge that this will be an on-going area of concern and uncertainty for the community.</p>	
<p>Action 10: Dampier Bay Public Access</p>	<p>Action 10 will secure public access along Dampier Bay and provide assurance to the public in the longer term of an accessible area along the waterfront.</p>	<p>Retain Action 10 as notified</p>
<p>Action 11: Dampier Bay Urban Design Guide</p>	<p>This action facilitates the development of a non-regulatory design guide for Dampier Bay and will complement the provisions in the District Plan.</p>	<p>Retain Action 11 as notified</p>
<p>Action 12: Cruise Ship Berth</p>	<p>The Council is pleased to see this action is included in the Draft LPRP and strongly supports its retention. Action 12 will facilitate the progression of the return of</p>	<p>Retain Action 12 as notified</p>

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Action 13: Quantitative risk assessment of bulk liquids storage facilities	<p>cruise ships to Lyttelton to ensure a fit for purpose berth and landside facilities are provided. The return of a cruise ship berth to Lyttelton is essential and has significant wider economic benefits for recovery of Christchurch and Canterbury, and benefits to the wider South Island.</p> <p>The Council also supports the Action's inclusion of consideration of options for a short term berth which will facilitate the return of cruise ships to Lyttelton in the short term.</p>	Retain Action 13 with an amended timeframe as follows: Quantitative Risk Assessment to be completed within <u>nine</u> six months of Gazettal of this Recovery Plan
Support with amendment to the timeframe	<p>The Council accepts the need for a QRA to be undertaken and the urgency expressed in the Hearing Panel report. The Council accepts the lead role for Action 8 and has commenced discussions on the process and project set up.</p> <p>The only concern relates to timing for the action. This concern revolves around ensuring there is sufficient time to take account of the various processes that will go into completing Action 13. The timeframe needs to account for project set up,</p>	

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	<p>development of a project brief, tendering and contract processes, funding agreements, reviewing of drafts and reporting to relevant Council committees or working parties (where necessary).</p> <p>It is suggested that the timing be extended to nine months which still provides the certainty that the QRA will be completed promptly but allows flexibility to account for the full process of getting a QRA completed.</p>	