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Subject: FW: Submission_Proposed Air Plan_1 May 2015 Lyttelton Port Company EMAIL:03161688
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Attachments: [{cidD32B1866DE796C41B0D3A99E82CE3F1E@ecan.govt.nz}LPC Submission_Proposed Air Plan_1 May 2015.pdf](#)
[{cid2F3A87346C0CBA4F887889FCCF1D653A@ecan.govt.nz}LPC Submission_Proposed Air Plan_Attached Maps_1 May 2015.pdf](#)
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Hi Mailroom,

Can you please TRIM and workflow this submission?

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Charles

----- Original Message -----

From: Kelleher Kim

Received: 1/05/2015 10:54 a.m.

To: ECInfo; Environment Canterbury; Services Customer; Services Customer

Cc: Andrew Purves Planning & Resource Management Ltd; Purves Andrew; Purves Andrew; Purves Andrew; Purves Andrew

Subject: Submission_Proposed Air Plan_1 May 2015 Lyttelton Port Company

Good Morning,

Please find attached LPC's submission on the Proposed Air Plan.

Rds

Kim

Kim Kelleher
Environmental Manager
Lyttelton Port of Christchurch

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1st May 2015

To Environment Canterbury
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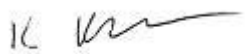
Form 5: Submissions on the Proposed Canterbury Air Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Name of submitter: Lyttelton Port Company Limited (*LPC*)

- 1 This is a submission on the **Proposed Canterbury Air Regional Plan** (*proposed Air Plan*).
- 2 LPC could not gain an advantage in trade competition through this submission.
- 3 The specific provisions of the proposal that LPC's submission relates to are those referred to in **Annexure 2** and **Annexure 3**, including provisions in the following Chapters:
 - 3.1 Chapter 2: Definitions
 - 3.2 Chapter 5: Objectives
 - 3.3 Chapter 6: Policies
 - 3.4 Chapter 7: Rules
 - 3.5 Planning Maps
- 4 The general and specific reasons for LPC's relief sought in **Annexure 2** and **Annexure 3** are set out in full in **Annexure 1**.
- 5 LPC seeks the following decision from the Hearing Panel on behalf of Environment Canterbury:
 - 5.1 The relief as set out in **Annexure 2** and **Annexure 3**.
 - 5.2 Any other similar relief that would deal with LPC's concerns set out in this submission.
- 6 LPC wishes to be heard in support of the submission.

- 7 If others make a similar submission, LPC will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Lyttelton Port Company Limited



Kim Kelleher
Environmental Manager
1 May 2015

Address for service of submitter:

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41 Chapmans Road, Hillsborough 8022
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New Zealand

1. **ANNEXURE 1: REASONS FOR SUBMISSION**

A. General Reasons for Submission

The Port – An overview

- 1 The Lyttelton Port of Christchurch is the major deep-water Port in the South Island and is at the hub of regional trade. The Port caters for a diverse range of containerised, bulk and break bulk trades and offers a full array of shipping services to exporters and importers, 24 hours a day, 365 days a year.
- 2 Lyttelton Port Company was formed in 1988 to manage the Port of Lyttelton.
- 3 LPC employs approximately 400 full time staff in operational, management and administration roles. Furthermore, there are approximately 1000 people employed by companies operating at Lyttelton Port.
- 4 At Lyttelton, the LPC landholding covers a significant area, extending from Magazine Bay in the west to Gollans Bay in the east.
- 5 The Port operations at Lyttelton are in close proximity to Lyttelton Township which includes existing residential areas.
- 6 Shortage of land is the single biggest constraint for the future development of Lyttelton Port. At present there is no available land immediately adjacent to the Port that the container terminal could expand into without displacing significant port activities or undertaking extensive reclamations.
- 7 On this basis, CityDepot on Chapmans Road was purchased in 2005 to provide an 'inland port' that would link with the Lyttelton Container Terminal. The CityDepot is the closest container depot site to the port and has the benefit of an existing rail siding.
- 8 CityDepot is an integral and integrated component within the infrastructure of Lyttelton Port of Christchurch, and cannot be distinguished in a functional or operational sense from the remainder of Port activities.
- 9 The efficient use and development of the Port as a significant physical regional infrastructure resource is identified in the Regional Policy Statement (*RPS*). The Proposed Air Plan contains an objective and a policy that recognises the importance of nationally and regionally significant infrastructure in order to give effect to this higher order document and this is supported by LPC.
- 10 However, there are a number of other provisions in the Proposed Air Plan that do not adequately address the unique circumstances of the Port or are just problematic generally.
- 11 Chapter 3 (Air Quality) of the Canterbury Natural Resource Regional Plan (NRRP) included a number of specific provisions relating to the Port, and in particular those relating to electricity network load shedding and the handling of bulk materials. These were the subject of a protracted and expensive Environment Court mediation process

during the preparation of Chapter 3 of the NRRP. Agreements were reached and Consent Orders were issued in the second half of 2009.

- 12 There needs to be a clear rationale as to why these provisions have been removed less than six years later. There do not appear to be any: Lyttelton remains outside the Christchurch Air Shed and there is no clear cost benefit analysis under section 32 of the Act completed to justify why these provisions have been removed.
- 13 There are a number of other rules and conditions that have been introduced which have the potential impact on the port operation and again no clear rationale has provided to justify these rules, a number of which are *ultra vires* of the Act.

B. Specific Submission Points

- 14 The following is a brief overview of the key issues from LPC's submission points in **Annexure 2**.

Definitions

- 15 The definition of "sensitive activity" is important as it used in the rules and associated conditions relating to setbacks.
- 16 Clause (c) of the definition refers to a "public amenity area." This definition in turn is broadly defined. LPC consider a public amenity area should not extend to areas where the public are in transit. The probability of any significant adverse effects from a localised discharge in these situations is negligible.
- 17 Clause (d) of the definition refers to a "place of assembly". Likewise, the definition could unintentionally capture transient recreational activities in the coastal marine area and this could have the unintended consequence of imposing a setback on the Port from the mean high water springs. Again, the probability of any significant adverse effects from a localised discharge in these situations is negligible.

Objectives and Policies

- 18 The Proposed Air Plan includes Objective 5.7 and this is supported. However, the word "wellbeing" used in Objectives 5.1 and 5.2 is considered too vague. The Section 32 report variously refers to "wellbeing" as meaning "economic wellbeing" but also as meaning "amenity values". This becomes a particular problem with Policy 6.1 because it states discharges are not to cause "adverse effects on human health and wellbeing" and in this context one assumes it is referring to amenity values. It is considered too high a bar for discharges to have no adverse effects on amenity values. LPC's submission requests a number of amendments:
 - 18.1 Objectives 5.1 and 5.2 be amended so that they refer to health outcomes only;
 - 18.2 Policy 6.1 (a) is amended so it refers to health outcomes only;
 - 18.3 Policies 6.7 and 6.8 together are promoting the relocation of discharges that are causing adverse effects from industrial and trade premises that for historic

reasons may be in close proximity to residential areas. This is inappropriate and in the case of the Port it simply cannot relocate. The policies should be deleted;

- 18.4 Policy 6.11 is supported as far it goes but it also needs to recognise that the potential for reverse sensitivity effects on nationally and regionally significant infrastructure should be avoided;
- 18.5 Policy 6.14 needs better reflect the case-law on how the precautionary principle (approach) is to be treated under RMA;
- 18.6 Nationally and regionally significant infrastructure needs to be extracted from Policy 6.19 and another policy introduced for such infrastructure.

Rules on Generators

- 19 LPC uses two diesel generators (600 Kw each) for the purposes of electricity network load shedding as well providing a back-up power supply. The ability to network load shed is considered critical because of the direct savings in electricity cost for LPC and the incentive it provides to keep the generators in proper working order. The generators are critical in times of electricity outages, noting that the power supply to Lyttelton is only on standard poles and so the port is vulnerable to outage.
- 20 LPC's submission seeks amendments to the rule or in the alternative requests the rule in the current plan as it applies to the Port be reinstated.

Rules Bulk Material Handling

- 21 LPC handles a range of bulk materials at the port. These typically involve imported fertiliser products, palm kernel products, and clinker or cement which are critical for farming and the construction industry; as well as coal which is exported overseas. Coal export is important to the West Coast economy. LPC considers that the rule in the current plan as it applies to the handling of bulk material at the Port should be reinstated.

Rules and conditions being certain

- 22 Rules 7.3, 7.15, 7.16, 7.17 and 7.18 lack sufficient certainty and should be deleted. It is a fundamental principle that people need to be able to read a plan and determine whether their activities comply with a rule and understand the status of the activity in question. Specifically, LPC considers:
 - 22.1 The matters contained in Rule 7.3 are addressed under Section 17 and Part 12 of the Act. The issues of whether a discharge may be objectionable or offensive should only be introduced as a matter of policy (which it is has been) and perhaps as a matter for discretion when considering a restricted discretionary activity;
 - 22.2 The requirements under Rules 7.15 and 7.16 could be addressed as a matter for discretion on a restricted discretionary activity, noting the rules are also problematic because they refer to discharges generally;
 - 22.3 The same applies to Rules 7.17 and 7.18: the matters raised in these rules can be addressed as a matter for discretion, noting that there is policy on this in any

event. It is unreasonable to classify activities non-complying or prohibited based on these guideline values, or “guideline” values generally, and then further to subject the rule to an evaluative judgement as to whether the guidelines values are likely to be exceeded.

The rules are inconsistent with the other rules that apply to large scale fuel burning devices and rules are inconsistent with each other with Rule 7.17 referring to a large scale “solid” fuel burning and Rule 7.18 simply referring to a large scale fuel burning device.

22.4 There are a number of conditions that state a discharge does not occur within a defined number of meters from wāhi tapu, wāhi taonga or site of significance to Ngāi Tahu. Without identification of the sites the conditions are void for uncertainty. In the case of the Port, Lyttelton Harbour/ Whakaraupō is part of the statutory acknowledgement area for Ngāi Tahu (Te Tai o Mahaanui) and therefore the condition could potentially capture all handling of bulk materials at the Port and other port activities.

22.5 Rule 7.36 requires all discharges via an extraction vent from a workshop involved in welding and grinding etc. are filtered to reduce the PM₁₀ concentrations. The condition is onerous for many smaller-scale workshops that vent for a limited time.

Planning Maps

23 LPC supports the exclusion of Lyttelton from the Christchurch Air Shed.

ANNEXURE 2: SPECIFIC TEXT CHANGES AND REASONS

Provision	Change Sought	Reasons
Definition		
Public amenity area	<p>Amend the definition of public amenity area by deleting reference to "pedestrian walkways."</p> <p>Delete the term roadway and replace with the term "Road Reserves" as follows: "<u>Means a Local Purpose Reserve (Road) within the meaning of the Reserves act, 1997.</u>"</p> <p>Alternatively amend the definition of "roadways" to include footpaths.</p> <p>Define malls and precinct area to make it clear that these are outdoor areas that have been designed for people to congregate and stay for a period time.</p>	<p>The definition of public amenity is too broad. It should not include pedestrian walkways because the public are in transit and the probability of any significant adverse effects from a localised discharge is negligible.</p> <p>The term "roadway" is not defined however but it should include footpaths.</p> <p>The terms "malls" and "precincts" also need to be defined.</p>
Sensitive activity	<p>Clause (d) be amended as follows:</p> <p><i>"a place of public assembly for recreation, education, worship, culture or deliberation purposes <u>excluding recreational activities carried out in the coastal marine area.</u>"</i></p>	<p>Clause (d) should exclude recreational activities in the coastal marine area. These are transient activities and the probability of any significant adverse effects from a localised discharge is negligible and would unintentionally capture the port operations.</p>
Objectives		
Objective 5.1 and 5.2	Delete the word "wellbeing" in Objectives 5.1 and 5.2.	<p>It is unclear why the word "wellbeing" has been included in these objectives. Objectives 5.1 and 5.2 appear to be addressing the health effects.</p> <p>The term wellbeing is used in the context of economic, social and cultural wellbeing under Section 5.</p>

Provision	Change Sought	Reasons
Objective 5.5	Objective 5.7 is supported and be retained.	Nationally significant infrastructure such as the port needs to be able to operate and also develop in response to the economic growth of greater Christchurch and this should be factored in when considering air quality matters.
Policies		
Policy 6.1	Delete the word "wellbeing" in Clause 6.1 (a).	The term wellbeing is too vague and it is too high of a bar for a policy to state that there should be "no adverse effects" on wellbeing. Amenity related matters are addressed in clauses (b) and (c) and are supported.
Policy 6.7 and 6.8	Policies 6.7 and 6.8 be deleted	<p>The words "authorised landuse change" in Policy 6.7 are open to any matter of interpretation and the policies appear to be overriding the implementation of the best practicable option that by definition has to take into account the sensitivity of the receiving environment.</p> <p>The implications of Policy 6.8 are those activities that cannot relocate such as the port will be penalised in an on-going manner by having its consent durations limited.</p>
Policy 6.10	<p>Amend Policy 6.9 by deleting the words "at least":</p> <p><i>"All activities that discharge into air apply, at least, the best practicable option so that cumulative effects are minimised."</i></p>	The word "at least" implies the BPO is the last resort. The Act provides for the best practicable option.

Provision	Change Sought	Reasons
Policy 6.11	<p>Policy 6.11 is supported subject the addition of new clause (b):</p> <p>(a) Recognise the contribution of nationally and regionally significant infrastructure to the regional and national economy and provide for the operation and development of that infrastructure.</p> <p>(b) <u>Recognise that reverse sensitive effects associated with air discharges emitted from nationally and regionally significant infrastructure should be avoided, acknowledging this issue is addressed in Christchurch Replacement District Plan.</u></p>	<p>Nationally significant infrastructure such as the port needs to be able to develop in response to the economic growth of greater Christchurch and this should be factored in when considering air quality matters and so the policy is supported.</p> <p>However, there also needs to be recognition that reverse sensitive effects should be avoided by way of policy, accepting any provisions to implement this policy would be contained in a Christchurch Replacement District Plan.</p> <p>The Independent Hearings Panel has recently released its first decision for the Christchurch Replacement District Plan and introduces Objective 3.3.12 of Strategic Directions Chapter to address this very issue.</p>
Policy 6.14	<p>Amend the policy as follows:</p> <p><i>"Apply a precautionary approach to the discharge of contaminants to air where the adverse effects are unknown or uncertain <u>but are potentially significant.</u>"</i></p>	<p>The precautionary principle is applied when the effects are both unknown or uncertain and potentially significant. Recognition that the effects need to be potentially significant as well as uncertain was inserted after submissions to the NRRP but has been removed again in the proposed air plan.</p>
Policy 6.19 and a New Policy	<p>Policy 6.19 be amended to exclude reference to regionally and nationally significant infrastructure and instead a separate policy be introduced as follows:</p> <p>Enable discharges of contaminants into air associated with large scale, industrial and trade activities and nationally and regionally significant infrastructure, in locations where the discharge is compatible with the surrounding land use pattern and while ensuring that adverse effects on air quality are minimised.</p> <p>New Policy</p> <p><u>"Enable discharges of contaminants into air associated with and nationally and regionally significant infrastructure while ensuring that adverse effects on air quality are managed.</u></p>	<p>Given the Proposed Air Plan recognises the importance of nationally and regionally significant infrastructure it is inappropriate to include a policy that addresses the management of such infrastructure together with large-scale industrial and trade premises generally.</p> <p>Reference to discharges that are compatible with the surrounding landuse patterns is nonsensical in-so-far as the Port is concerned given the proximity to Lyttelton Township.</p> <p>The word "minimised" in Policy 6.19 is unduly restrictive given the port's size and proximity to the township means effects cannot be easily retained within its property (i.e. internalised).</p>

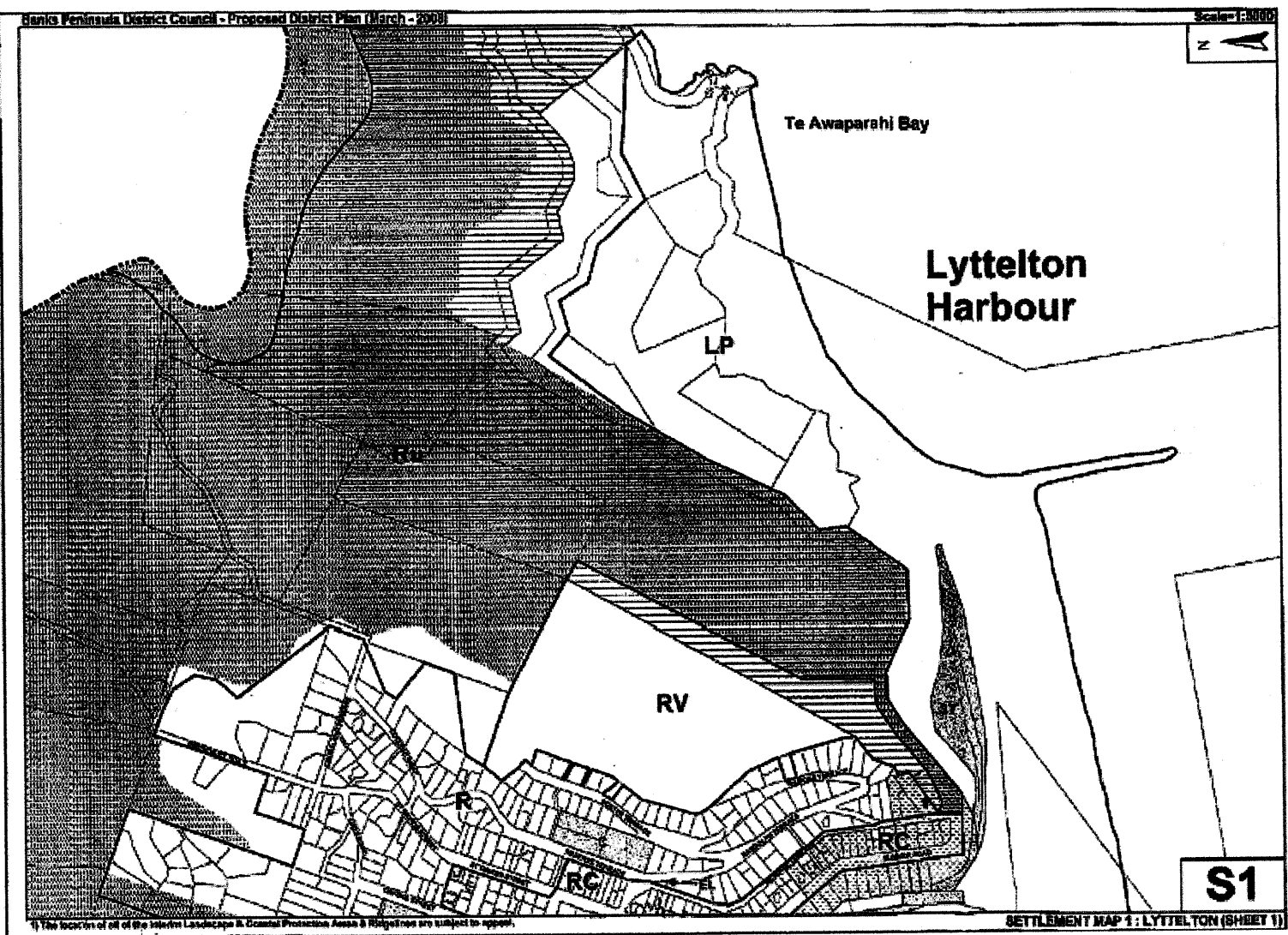
Provision	Change Sought	Reasons
Rules		
Rules 7.3, 7.15, 7.16, 7.17 and 7.18	Rules 7.3, 7.15, 7.16, 7.17 and 7.18 be deleted	<p>The rules are <i>ultra vires</i> of the RMA due to a lack of certainty. Rules must be able to be read by a person to determine whether a discharge complies with the rule and to understand the status of the activity associated with the discharge.</p> <p>The matters raised in the rules should be addressed as matters for discretion where relevant, and there are already policies that address these issues and would be considered under any restricted discretionary or full discretionary consent applications (i.e. Policy 6.5 and Policy 6.21).</p>
New Rule 7.25A	<p>Insert new Rule 7.25A as follows:</p> <p><u>The discharge of contaminants into air, for the purpose of emergency electricity generation, maintenance and peak electricity network load management, from the combustion of diesel, petrol, liquefied petroleum gas or compressed natural gas in any stationary large scale internal combustion device within the Lyttelton Port Zone shown as "LP" on Maps S1, S2 and S3 in Schedule XX with a net energy output not exceeding 5MW:</u></p> <p><u>Is a controlled activity provided the following conditions are</u></p>	<p>The rules in Chapter 3 of the NRRP relating to electricity network load shedding were the subject of a long and protracted Environment Court mediation process between CRC and LPC. There would need to be a rationale (i.e. air quality monitoring results indicating a clear issue with the generators) that justify the changes from the rules previously agreed to.</p> <p>New Rule 7.25 is unclear as it refers to a cap of 2MW on generators operated outside the air shed which is to apply to a large scale internal combustion engine "device" singular.</p> <p>If that is the case then the rule could be retained subject to Condition 1 being deleted and instead simply have the chimney height being considered on a case-by-case basis given the Council</p>

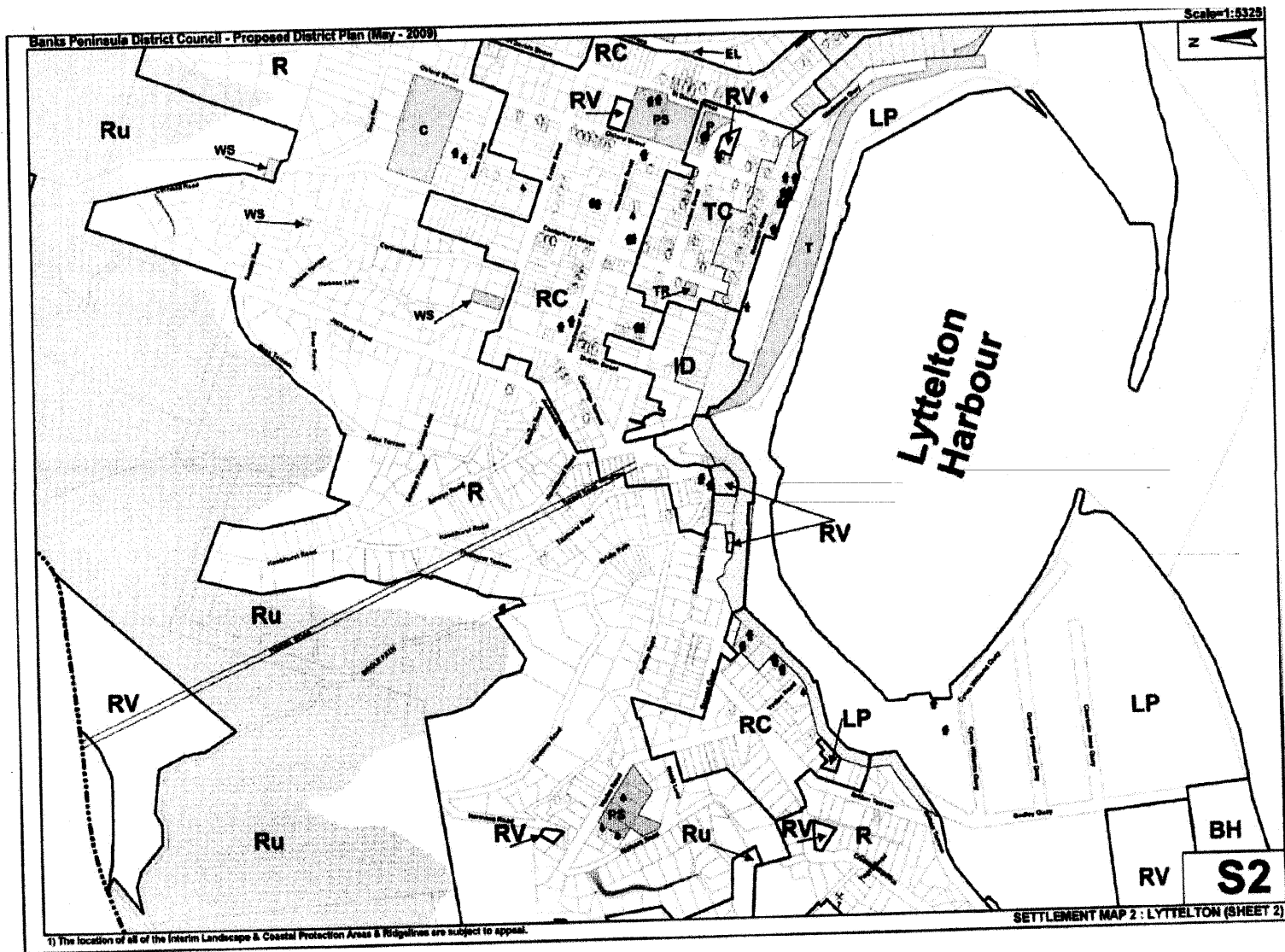
Provision	Change Sought	Reasons
	<p><u>meet:</u></p> <p><u>1. for internal combustion equipment legally established and existing as of 1 May 2015 be:</u></p> <p><u>(a) more than 120 metres from any sensitive activity located on a different property (excluding the Coastal Marine Area or any road reserve); or</u></p> <p><u>(b) more than 120 metres from any part of another site (excluding the Coastal Marine Area or any road reserve) outside the Lyttelton Port Zone where any individual is likely to be exposed to the contaminant for a period of one hour or more per day; or</u></p> <p><u>2. for internal combustion equipment established after 1 May 2015 be:</u></p> <p><u>(a) more than 100 metres from any sensitive activity located on a different property (excluding the Coastal Marine Area or any road); or</u></p> <p><u>(b) more than 100 metres from any part of another site (excluding the Coastal Marine Area or any road) outside the Lyttelton Port Zone where any individual is likely to be exposed to the contaminant for a period of one hour or more per day; and</u></p> <p><u>(c) occur via a chimney stack at a height of at least 3 metres above immediate ground level; and</u></p> <p><u>(d) be directed vertically into air and shall not be</u></p>	<p>has specifically reserved control over this matter. The chimney height specifications in the context of the Port provide no environmental benefit given the buffer distance which will be maintained between the generators and any sensitive activity.</p> <p>In addition, the conditions need to make it clear there is no time limit for operations of the generators during power outages.</p> <p>If the 2 MW limit included in 7.25 is meant to be a cumulative cap on a property then LPC seeks Rule 7.25A be inserted.</p>

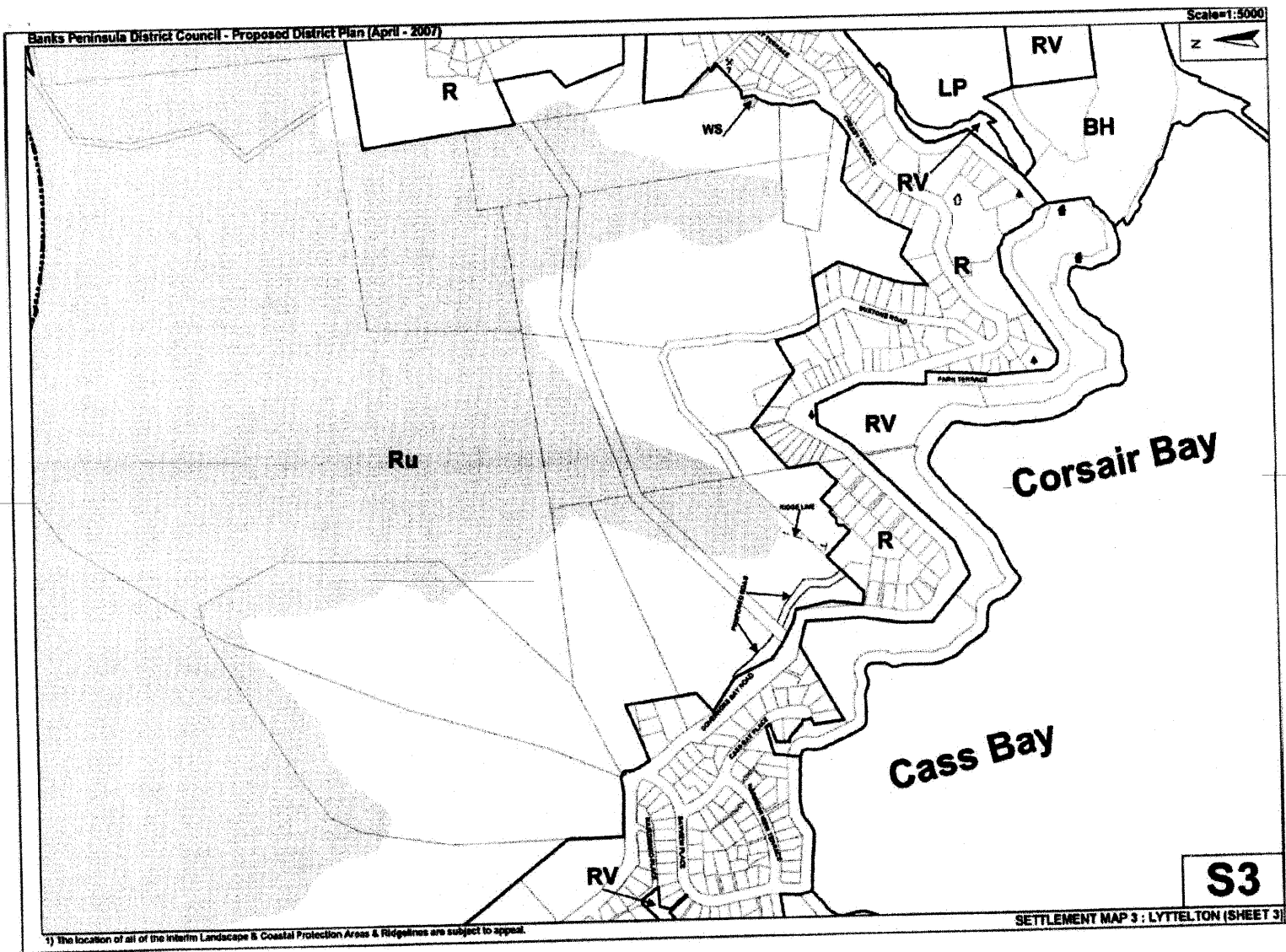
Provision	Change Sought	Reasons
	<p><u><i>impeded by any obstruction above the stack which decreases the vertical efflux velocity, below that which would occur in the absence of such obstruction;</i></u></p> <p><u><i>3. Shall other comply with Conditions 3, 4, 5, 6 and 7 of Rule 7.25 except that there is no time limit shall apply for generator use during a power outage.</i></u></p> <p><u><i>The CRC reserves control over the following matters:</i></u> <u><i>1. Any measures necessary to prevent or minimise adverse effects on air quality; and</i></u> <u><i>2. The emission rate of contaminants; and</i></u> <u><i>3. The ability of the equipment to disperse contaminants, including emission stack height and design, and emission velocity; and</i></u> <u><i>4. Maintenance of the internal combustion equipment; and</i></u> <u><i>5. The matters set out in Rule 7.2.</i></u></p>	
Rule 7.30	<p>Amend Rule 7.30 so that it permits the discharge of contaminants into air from unsealed or unconsolidated surfaces from an industrial or trade premise or alternatively define the words "unsealed/unconsolidated" and "earthworks" as follows or similar:</p> <p><u><i>"unsealed/unconsolidated means land that has been disturbed from Earthworks during site construction and has not been stabilised by vegetation, geotextile, mulch, sealing or by any other means which results in fugitive dust emissions beyond the boundary of the property."</i></u></p> <p><u><i>"Earthworks: means the disturbance of land surfaces by blasting, blading,</i></u></p>	<p>The handling of bulk materials at the Port could well be caught by Rule 7.30. It appears that the rule has been written to capture major works that involve large-scale land disturbance noting that Chapter 3 of the NNRP contains no area threshold.</p> <p>The term "development property" is vague and could be interpreted any number of ways but it is assumed it relates to industrial and trade premises generally. It submitted that the rule needs to be clearly demarcated from those rules involved the handling or storage of bulk materials.</p> <p>Therefore the words "unsealed" and "unconsolidated" should be defined so that bulk handling of materials is not inadvertently captured.</p> <p>LPC supports the condition requiring a dust management plan.</p>

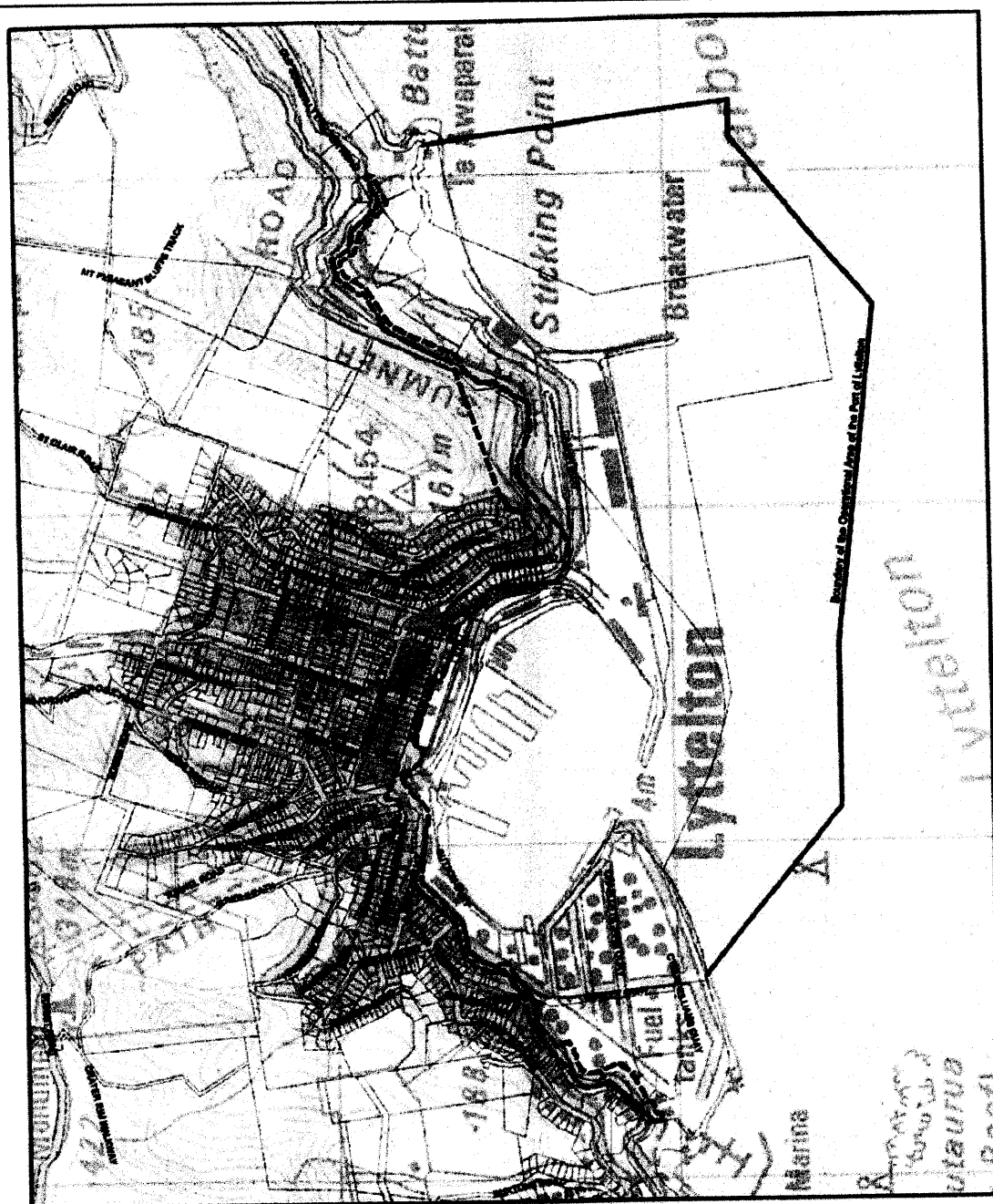
Provision	Change Sought	Reasons
	<u>contouring, ripping, moving, removing, placing or replacing soil and earth, or by excavation, or by cutting or filling operations but excludes any cultivating of paddocks in a rural area."</u>	
Rule 7.36	Condition 2 of Rule 7.36 be deleted.	The requirement that all discharges via an extraction vent are filtered to reduce the PM ₁₀ concentrations is considered onerous for smaller-scale workshops that vent for a limited duration. The workshops operated by LPC fall into this category and furthermore are well setback from any sensitive activities. The section 32 report does not examine the costs and benefits of this inflexible condition.
New Rule 7.38A	<p>Insert new rule 7.38A as follows:</p> <p><u>Except as provided for in Rules 7.37 and 7.38, the discharge of contaminants into air from industrial or trade premises or involving, or as part of, industrial or trade processes from the extraction, handling, conveying, or storage of bulk materials:</u></p> <p><u>1. on land shown as 'LP' on the Maps S1, S2 and S3 in Schedule 10, and;</u></p> <p><u>2. on land (excluding the Coastal Marine Area) within the Boundary of the Operational Area of the Port of Lyttelton as shown on Map 5.1 in Schedule 10, is a restricted discretionary activity.</u></p> <p><u>Environment Canterbury has restricted its discretion to the following matters:</u></p> <p><u>1. Avoiding, remedying or mitigating the effects from the discharge of dust on the landward side of the CMA and beyond the boundary of the Lyttelton Port Zone.</u></p> <p><u>2. Available measurements, samples, analyses, surveys,</u></p>	<p>Rule 7.37 applies to the handling of any bulk solid material no matter its particle size and therefore would result in bulk handling operations at the port being considered a full discretionary activity.</p> <p>Rule 7.38 applies to the bulk storage of cargo. Even with the introduction of particle size parameter to Rule 7.38, the outdoor storage of coal for example could not comply with the 1000 tonne limit.</p> <p>Furthermore the conditions on setbacks from sensitive activities cannot be achieved in some locations at the Port and, as discussed elsewhere, the reference to wāhi tapu, wāhi taonga or site of significance to Ngāi Tahu is void for uncertainty and in any event could potentially capture all handling or storage of bulk materials at the Port</p> <p>LPC submits that the Rule AQL42C be reinstated, which was the agreed outcome of the Environment Court mediation process during the preparation of the NRRP. The reasons for the Rule AQL42C are set out in page 3-249 of the NRRP.</p> <p>A new Schedule 10 or similar will be required for the maps. The</p>

Provision	Change Sought	Reasons
	<p><u>investigations, or inspection.</u></p> <p><u>3. The matters set out in Rule 7.2</u></p> <p>and</p> <p>Insert those maps contained in Chapter 3, Schedule AQL 7 of the NNRP or any equivalent.</p>	<p>maps attached to this submission are currently those found in Chapter 3, Schedule AQL 7 of the NNRP. These can be updated as necessary.</p>
Rules 7.37 and 7.39 and any other rule containing a condition which refers to wāhi tapu, wāhi taonga or site of significance to Ngāi Tahu.	Conditions 6 and 5 of Rules 7.37 and 7.38 respectively be deleted and any other rules that include a setback condition which refers to wāhi tapu, wāhi taonga or site of significance to Ngāi Tahu.	The reference to wāhi tapu, wāhi taonga or site of significance to Ngāi Tahu is void for uncertainty and could potentially capture all handling of bulk materials at the Port of Lyttelton Harbour/Whakaraupō is considered to be of significance (which is usually is because it is part of the statutory acknowledgement area for Ngāi Tahu (Te Tai o Mahaanui)).
Schedule 2 Criteria for assessing Offensive or objectionable dust	Schedule 2 incorporate a revised guideline if the timing allows.	The schedule states that regard is had the 2001MfE Good Practice Guideline for Assessing and Managing the Environmental Effects of Dust Emissions. The guideline is well out of date. The Dust GPG is currently in the process of being re-written, and the updated GPG should provide improved and updated guidance. MfE's target date for publishing the revised dust GPG is June 2015. To ensure CRC's Schedule 2 reflects current best practice and takes a nationally consistent approach, before being finalised, it should be revised to incorporate the guidance which will be provided in the revised Dust GPG









Map 5.1 Operational Area of the Port of Lyttelton and the Lyttelton Inner Noise Control Boundary

- Boundary of the Operational Area of the Port of Lyttelton
- Lyttelton Inner Noise Control Boundary

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APR 2009 Map 5.1 Operational Area of Port of Lyttelton and the Lyttelton Inner Noise Control Area 001124.mxd