

**From:** [Lizzie Thomson](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** [Simon Hedley](#)  
**Subject:** Plan Change 7 LWRP Further Submission  
**Date:** Friday, 6 December 2019 9:06:26 AM

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Good morning,

Please find attached a further submission for and on behalf of Lands and Survey (South) Ltd, in respect of submissions for Plan Change 7 to the Canterbury Land and Water Regional Plan.

Kind regards,

**Lizzie Thomson**  
Environmental Planner

**Lands and Survey**  
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Friday, 6 December 2019

Environment Canterbury  
PO Box 354  
Christchurch

**By email:** [mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz)

**RE: Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan**

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Lands and Survey (South) Ltd hereby formally lodges Further Submissions with respect to the proposed Plan Change – Plan Change 7 to the Canterbury Land and Water Regional Plan.

Lands and Survey (South) Ltd has particular expertise in the resource consent procedures related to the extraction and processing of river gravels. We are involved in the preparation, lodgement, approval and compliance of resource consent activities associated with gravel extraction and processing in river within the Canterbury Region. Accordingly, we have an interest greater than the general public in the Objectives, Policies and Rules of the Canterbury Land and Water Regional Plan (CLWRP).

Lands and Survey (South) Ltd could not gain an advantage in trade competition through this submission.

Lands and Survey (South) Ltd wishes to be heard in support of this submission.

Kind regards,



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Simon Hedley  
**Technical Director - Planning**  
**Lands and Survey (South) Limited**

**Name of Submitter:** Lands and Survey (South) Ltd

**Address for Service:**  
Lands and Survey Ltd  
PO Box 1326  
Christchurch  
Attention: Simon Hedley

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<b>(1) I support the submission of:</b>	<b>(2) The particular parts of the submission I support are:</b>	<b>(3) The reasons for my support are:</b>	<b>(4) I seek that the whole or part of the submission be allowed or disallowed:</b>
Rooney Earthmoving Limited	<ol style="list-style-type: none"> <li>1. 05.136 (PC7-392.1)</li> <li>2. 05.141 (PC7-392.2)</li> <li>3. 05.149 (PC-7392.3)</li> <li>4. Definition of Indigenous Freshwater Species Habitat (PC7-392.4).</li> </ol>	<ol style="list-style-type: none"> <li>1. The proposed amendment restricts the activities that have been enabled by this rule since it first became operative under the LWRP, for example, habitat enhancement, creation of bird islands and erosion protection. There does not appear to be an additional rule proposed which would enable such enhancement activities to occur.  Lands and Survey (South) Ltd supports point PC7-392.1 as it highlights the importance of rules that support future potential habitat restoration / site remediations and enhancements. If these types of activities are not enabled and supported by the LWRP, they are less likely to occur.</li> <li>2. The proposed amendments to Condition 3 are considered to be too arduous for temporary and short-term activities and quite unachievable in these circumstances. The proposed amendment would make river-based gravel extraction impractical and uneconomic by adding an additional layer of complicated and unnecessary compliance and costs. We consider that the current Condition 3 achieves the purpose of the Act and protects water quality while enabling reasonable and sustainable activities, therefore point PC7-392.2 is supported.</li> <li>3. As there are requirements in the Gravel Management Strategy, the removal of diversions from this permitted activity rule seems disproportionate to the potential effects that the Plan is seeking to regulate. Therefore, point PC7-392.3 is supported</li> <li>4. It is unclear how the proposed IFSH areas have been assessed for accuracy, how the identified areas would apply and whether the identified areas supported by recent independent research. It is also unclear which species each of the identified areas are alleged to provide habitat for. Therefore, making it impossible for an applicant to adequately mitigate any potential effects on the identified species.</li> </ol>	Whole submission to be allowed.

<p>South Canterbury Gravel Extracting Industry</p>	<ol style="list-style-type: none"> <li>1. 05.136 (PC7-393.1)</li> <li>2. 05.141 (PC7-393.2)</li> <li>3. 05.149 (PC-7393.3)</li> <li>4. Definition of Indigenous Freshwater Species Habitat (PC7-393.4).</li> </ol>	<ol style="list-style-type: none"> <li>1. Lands and Survey (South) Ltd supports point PC7-393.1 as it highlights the importance of rules that support future potential habitat restoration / site remediations and enhancements. If these types of activities are not enabled and supported by the LWRP, they are less likely to occur.</li> <li>2. Point PC7-393.2 is supported as the proposed amendments to Condition 3 are considered to be too onerous for temporary and short-term activities.</li> <li>3. As there are requirements in the Gravel Management Strategy, the removal of diversions from this permitted activity rule seems disproportionate to the potential effects that the Plan is seeking to regulate. Therefore, point PC7-393.3 is supported.</li> <li>4. Point PC7393.4 is supported as it is unclear how the proposed IFSH areas have been assessed for accuracy, how the identified areas would apply and whether the identified areas supported by recent independent research. It is also unclear which species each of the identified areas are alleged to provide habitat for. Therefore, making it impossible for an applicant to adequately mitigate any potential effects on the identified species.</li> </ol>	<p>Whole submission to be allowed.</p>
<p>Road Metals Company Limited</p>	<ol style="list-style-type: none"> <li>1. 02.09 Highest Groundwater Level (PC7-480.1)</li> <li>2. 05.177 (PC-480.3)</li> </ol>	<ol style="list-style-type: none"> <li>1. Point PC7-480.1 is supported as it is important that <u>relevant</u> groundwater data is utilised by ECan staff when making decisions. Failure to make the amendments proposed in PC7-480.1 could result in significant economic impacts for operations such as quarries through loss of resource and would not achieve Part 2 of the RMA.</li> <li>2. It is considered to be inappropriate to require a rehabilitation plan under the LWRP.</li> </ol>	<p>Whole submission to be allowed.</p>
<p>Fulton Hogan Limited</p>	<ol style="list-style-type: none"> <li>1. 02.09 Highest Groundwater Level (PC7-428.1)</li> </ol>	<ol style="list-style-type: none"> <li>1. Point PC7-428.1 is supported as it is important that relevant groundwater data is utilised by ECan staff when making decisions. Failure to make the amendments proposed in PC7-428.1 could result in</li> </ol>	<p>Whole submission to be allowed.</p>

	<ul style="list-style-type: none"> <li>2. 05.140 (PC7-428.6)</li> <li>3. 05.151(PC7-428.7)</li> <li>4. 05.152 (PC7-428.8)</li> <li>5. 05.177 (PC7-428.9)</li> <li>6. 05.177 (PC7-428.12)</li> <li>7. 05.178 (PC7-428.13)</li> <li>8. 08.05.17 (PC7-428.11)</li> </ul>	<p>significant economic impacts for operations such as quarries through loss of resource and would not achieve Part 2 of the RMA.</p> <ul style="list-style-type: none"> <li>2. A culvert length of 10 m is not wide enough to allow operators to meet health and safety requirements when crossing.</li> <li>3. As per point 2.</li> <li>4. The proposed amendments to Rule 5.152 include more stringent sediment limits that may undermine the current efficient system of providing gravel extraction. The amendments proposed by Fulton Hogan Ltd in PC7-428.8 are supported.</li> <li>5. The proposed amendment that requires a rehabilitation plan is considered to be inappropriate as deposited substances can only be cleanfill and deposited to at least 1 m above highest groundwater and a management plan is already required under MfE guidelines. The amendments to this rule proposed by Fulton Hogan Ltd are supported.</li> <li>6. As per point 4.</li> <li>7. As per point 4.</li> <li>8. Being required to surrender 50% of water allocation from a transfer may reduce the volume of water available to a consent holder for mitigation measures such as dust management. This may cause compliance issues.</li> </ul>	
NZ Defence Force	<ul style="list-style-type: none"> <li>05.140 (PC7-344.1)</li> <li>05.141 (PC7-344.2)</li> </ul>	<p>The proposed changes to the provisions relating to temporary activities and associated discharges are overly onerous and impractical. The proposed provisions would require monitoring to confirm specific total suspended solids limits are met and the temporary activity and associated discharges are permitted.</p>	<p>Whole submission to be allowed.</p>