

## Comments

### LTP 2021-31

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<b>Are you submitting on behalf of an organisation?</b>	Yes, I'm submitting on behalf of an organisation
<b>Which organisation are you submitting on behalf of?</b>	Road Metals Co Ltd
<b>Which age category are you in?</b>	-
<b>Do you have any further comments on the activities proposed in specific portfolio/s (please select all those you wish to comment on):</b>	
<b>Where do you live in Canterbury? Select your district below:</b>	-
<b>Would you like to see us investing in the following initiatives in your area? Kaikoura</b>	
<b>Would you like to see us investing in the following initiatives in your area? Hurunui</b>	
<b>Would you like to see us investing in the following initiatives in your area? Waimakariri</b>	

**Would you like to see us investing in the following initiatives in your area? Christchurch**

**Would you like to see us investing in the following initiatives in your area? Selwyn**

**Would you like to see us investing in the following initiatives in your area? Ashburton**

**Would you like to see us investing in the following initiatives in your area? Mackenzie**

**Would you like to see us investing in the following initiatives in your area? Timaru**

**Would you like to see us investing in the following initiatives in your area? Waimate**

**Would you like to see us investing in the following initiatives in your area? Waitaki**

**Do you wish to speak to your submission?** No

**Would you like to be kept up-to-date with the outcome of this consultation?** Yes

**How did you find out about giving feedback?**

**From:**  
**To:**  
**Cc:**  
**Subject:** ECan LTP submission  
**Date:** Thursday, 15 April 2021 9:29:25 am

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Good morning and many thanks for providing us with an extension of time in which to provide a submission in relation to this important document.

We have focussed our comments on the areas that relate to our core business as follows.

#### **Climate Change & Community Resilience:**

##### River Surveying

- ECan undertake the surveying of riverbeds especially those outside of river rating districts especially for those catchments that are subject to over allocation and degradation and regional river studies
- Review and recalculation of existing MBLs given the time lapse between the last survey
- Potential to redirect monies secured from royalties for this and other purposes
- The failure for additional and extensive hydrological surveys and gravel availability analysis will shift the focus to the applicant to demonstrate material availability through a SQEP (Suitably Qualified Experienced Person)
- Unfortunately, during periods of peak demand, the engagement of a SQEP can add further to the timeframe and cost to an already expensive consenting process

##### Rivers Advice

- We have noticed within the past quarter that the timeframe for the issue of GA advice exceeds the 10-working daytime frame as agreed under the Sth Canterbury MoU and the River Gravel Extraction CoP
- The delay in providing timely GA advice can implicate work programmes and planning especially during periods of peak demand so potentially there is a need for additional resources within this space
- We regularly hear from your staff as to '*why is it suddenly so busy?*' and that increase in workload coincides with the sealing season so there is a definite need for ECan to have greater preparedness for this and that is likely to require additional human resources
- Fast tracking of consents and GA's on rivers that are remote, have a history of extraction and for which there is no competition of material and the extraction has an immediate benefit to local community – flood mitigation, roading asset etc.

#### **By law, Code of Practice, Resource Consents & Permissions**

- Frustratingly gravel banking is still occurring and the current system is still subject to abuse
- There needs to be far greater emphasis on the demonstration of need and to date we have witnessed extreme interpretations of this
- it is important that the gravel returns align with the volume of material that was granted under the resource. Should there be a gross disparity between the two then the applicant has effectively removed material from consideration that could have been allocated to another applicant but has misled ECan on their demonstrated need.
- The RMA functions on a 1st serve basis, however we are aware of RC applications being submitted to ECan that should not be able to pass the s88 test. An extensive RFI is then initiated and unfortunately the 15-day timeframe for a response can be extended at the agreement of the council if the applicant requires more time to respond to the information request.
- These delaying tactics only add to the frustration of others who are in the queue behind them with complete and legitimate applications that include a demonstration of need. In our opinion



this is gravel banking in disguise

- In terms of the standard condition that requires submission of bird reports (Sept-Feb) prior to commencement of works, could the exemption conditions be extended to include where historically there is an absence of birds as has been illustrated from previous surveys.

#### Gravel Availability

- Gravel extraction has become increasingly competitive in the past number of years and there are many new entrants
- ECan and TAs need to ensure that access to the resource is achievable. Without effective planning there is potential for extraction to be constrained by incompatible activities
- A single resource consenting regime would also simplify the process and enable more cohesive and strategic planning around both access to resource and certainty of outcome

### **Leading Regional Planning, Consenting & Compliance**

#### Consent Monitoring

- The monitoring of consents is inconsistent and it is evident on some sites there is a disconnect between the planners and compliance staff as to the interpretation and application of conditions.
- For this to be entirely effective additional resources are required to ensure that all consents are monitored
- We note that targets are set for 80% of priority consents.

#### Cost of Consenting & Compliance

- The cost of consenting and compliance is considerably more expensive not including the level of information that is now required but also the additional time/resource required to compile a complete application
- The NPS/NES Freshwater has simply compounded this

#### Applicant Ranking System

- In tandem with resource consents, ECan could introduce a ranking system of applicants and this ranking is determined by their overall compliance and performance with granted resource consents
- A higher-ranking applicant would therefore have the ability to potentially jump the queue over a lower ranked applicant
- The ranking system would also enable the River Engineers to provide GA advice on a river that has an allocation over and above a lower ranked applicant
- The ranking system would have the benefit of all applicants seeking to enhance/improve their overall environmental reporting and compliance

#### Workshopping with ECan

- Undertaking of more frequent workshops/seminars with ECan when new methods, procedures and policies are introduced. e.g., fish passage under the NES Freshwater
- Provision and dissemination of information will only assist industry in improving its understanding of new policies

#### Canterbury Maps

- Overall, this is a fabulous resource however it is evident that not all matters are afforded an individual layer.
- For example, and from our experience on the Opihi River – Fairlie, the layers do not reflect flood protection vegetation adequately. This is something that I will note to our processing teams, as the issued maps will have to include better reference to our assets.
- It is important that issued maps include better reference not just to CRC assets but all matters

Regards *Grant*

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