

Response ID	5633809
Date of Contribution	13/04/2024 02:33:51 PM
First Name	George
Last Name	Kelcher

Your contact details

Email Address	
Post Code	
Are you submitting on behalf of an organisation, association or community group?	Yes, I'm submitting on behalf of an organisation, association or community group
Name of organisation, association or community group	Road Metals Co Ltd

Supporting your submission

Anyone can make a submission. All submissions will be considered by Council in accordance with our submissions policy before they make a decision.

You can upload documents to support your submission. Please make sure each page includes your name. The maximum file size is 200MB	See Upload File 1 section.
You can upload documents to support your submission. Please make sure each page includes your name. The maximum file size is 200MB	See Upload File 2 section.
If you would like to give feedback via a video, add a link to YouTube or Dropbox file below	See Upload File 3 section.
If you wish, you can also come to talk to Council about your submission at public sessions that are known as 'hearings'. Do you want to speak to Council about your submission at the Long-Term Plan hearings?	Yes
Please provide your phone number so we can contact you to schedule a hearing time	
Which age category are you in?	

Environmental Regulation and Protection

We are Canterbury's environmental regulator. We are responsible for managing natural resources including air, soil, water and land. We work with mana whenua, stakeholders, and communities to promote the sustainable management of these natural resources, and protect and enhance the health of our natural environment.

Question	Answer
We are proposing three options for funding our Environmental Regulation and Protection services. Please indicate which option you prefer	
Tell us more about the option you chose. What would you support and what would you suggest we change or do differently for Environmental Regulation and Protection?	

Targeted rate for Christchurch district biodiversity

We are proposing to fund more work to improve indigenous biodiversity outcomes in Christchurch and Banks Peninsula through a new targeted rate to properties in those areas.

This would be in addition to the work already funded through the existing regional rate. \$1million for this additional work is already included in Council's preferred option for Environmental Regulation and Protection services.

This equates to rates of 72 cents per year per \$100,000 of your property value.

If there is sufficient support for this new targeted rate, Council could decide to include this targeted rate regardless of whether Option 2 is ultimately accepted.

Question	Answer
Do you support this new biodiversity targeted rate?	
Tell us more about why you support / don't support this biodiversity rate?	

Community Preparedness and Response to Hazards

We support the community to be prepared for, and be able to respond to hazards, and to be prepared for changes in the natural environment.

Question	Answer
We are proposing three options for funding our Community Preparedness and Response to Hazards services. Please indicate which option you prefer	
Tell us more about the option you chose. What would you support and what would you suggest we change or do differently for Community Preparedness and Response to Hazards?	

Targeted rate for Selwyn district for river resilience

We are proposing a trial in the Selwyn district to carry out additional flood and river resilience activities.

Existing schemes do not change.

The cost for this additional work will be through a targeted rate to all properties in the Selwyn district. \$200,000 for this additional work is already included in Council's preferred option for Community Preparedness and Response to Hazards. This equates to rates of \$7.08 per rate-paying property in Selwyn district in 2024/25 (Year 1).

Question	Answer
Do you support a new river targeted rate in Selwyn?	
Tell us more about why you support / don't support this river rate	

Public Transport

We provide urban bus services within the Canterbury region, and ferry services in Christchurch.

We do this because public transport increases accessibility, connects communities and contributes to significant environmental benefits such as reduced greenhouse gas emissions, better air quality, and improved travel times across the transport network.

Question	Answer
We are proposing three options to fund Public Transport services. Please indicate which option you prefer	
Tell us more about the option you chose. What would you support and what would you suggest we change or do differently for Public Transport?	

Fees and Charges schedule

In order to make our consent-related costs more transparent, we are proposing a move towards a fixed-fee approach for some of our consenting work.

There are a number of benefits to this for our community including certainty of invoice amount, more timely invoicing, removing the need for a deposit and standard site visit costs will be built in.

Question	Answer
Do you agree with this new fees and charges proposal?	
Tell us more about why you support / don't support this approach. What would you support and what would you suggest we change or do differently?	

Uniform Annual General Charge / Uniform Annual Charge (UAGC/UAC)

UAGC/UAC are flat charges that are applied at the same amount for every property, no matter the value of your property. We currently charge ratepayers \$54.49 (in the 2023/24 year) for a range of services funded by UAGC or targeted UAC. This income represents approximately 8% of the total amount of money we collect from rates.

Council's preferred option is to set the UAGC and UAC charges to approximately 8% of total rates each year of the Long-Term Plan. This means as rates rise in the future, the value of the UAGC/UAC component of rates will also rise.

Question	Answer
Which Uniform Annual General Charge/Uniform Annual Charge	

(UAGC/UAC) rate increase would you support?	
Tell us more about the option you chose. What would you suggest we change or do differently?	

Strategies and policies

Question	Answer
We'd value your feedback on any of these strategies and policies	
Tell us what you think about the Financial Strategy	
Tell us what you think about the Revenue and Financing Policy	
Tell us what you think about the 30-Year Infrastructure Strategy 2024-54	
Tell us what you think about the Engagement, Significance and Māori Participation Policy	

Upload File 1.

You can upload documents to support your submission. Please make sure each page includes your name. The maximum file size is 200MB. If Image uploaded, will be shown below, if document it will be saved separately to this PDF.



No Image uploaded

Upload File 2.

You can upload documents to support your submission. Please make sure each page includes your name. The maximum file size is 200MB. If Image uploaded, will be shown below, if document it will be saved separately to this PDF.



No Image uploaded

Upload File 3.

You can upload documents to support your submission. Please make sure each page includes your name. The maximum file size is 200MB. If Image uploaded, will be shown below, if document it will be saved separately to this PDF.



No Image uploaded

7th October 2021

Presentation to Environment Canterbury Catchment Sub Committee.

The New Zealand Infrastructure Commission recently put out a statement which was repeated at the Quarry NZ Conference in July which said ***“Infrastructure must be prioritised to ensure that community needs outweigh “The opinions of a few.”***

This is a very apt statement in today's world as the strident voices of a few that at times seem to ignore reality and the effects that nature brings into our community on a regular basis. Rivers have been providing an aggregate resource ever since New Zealand started being developed with tracks - then roads - and in the last 150 years for the construction of the infrastructure that we now have today.

Over the last two decades it has become harder and more expensive to obtain consents to extract gravel from rivers and our Industry has been turning more and more to land based resources which still comes at a major cost and involves months and years of time to put consents in place. In doing this we are ensuring security of resource for decades to come.

The June 2000 ECan list of consent application charges showed that the short term gravel extraction consent fee was \$150.00 plus G.S.T. A long term consent for up to 35 years was \$600.00 plus G.S.T. The same non notified consents now are costing upwards of \$10,000 by the time we get a consent to disturb the bed of a river to be able to extract gravel, an air discharge consent, culvert installation consent, permission from LINZ & DOC & IWI, bird reports and at times searches for Lizards and Grasshoppers and other creatures which come at an even higher cost.

Our Industry fully realises that rivers will not continue to supply an endless supply of aggregates to satisfy the current demand but this said, rivers still need managing as floods and high flow events take place on a regular basis. This is where our Industry is one of the most cost effective tools that ECan has in their toolbox – the managing of excess gravel in rivers can be managed at largely nil cost by people and businesses that have had decades of experience in undertaking this work. My own experience now entails over 46 years of undertaking gravel extraction and river management and Road Metals Company Ltd has been in the business for over 66 years.

The move away from river based resources to permanent land based sites poses some risk for ECan as shown during the recent flood events in Mid Canterbury and especially in the Ashburton River area. With the Lake Hood Development and the permanent land based Quarry site now supplying most of the aggregate demand for the wider Ashburton area then

less and less gravel has been extracted from the Ashburton river resulting in an ever increasing gravel build up in the bed and a much reduced flow capacity inside the river banks during high flow and flood periods.

With climate change effects now becoming well recognised these events are, according to the experts, becoming a lot more frequent and we can expect higher volume extreme flood events. Ashburton was very lucky recently to escape being flooded by river flows overtopping the flood protection that is currently in place – much of this caused by gravel build up in the river bed itself resulting in lower flow capacity.

I believe that given the extreme events that have been taking place over the last few years that ECan now has a responsibility to be planning ahead and to be taking advantage of all the options to manage the rivers under their control in the most cost efficient manner available. A major part of this could be to make it easier to extract gravel from the built up islands in the bed of a lot of rivers, design the beds to be wider to enable a higher flow capacity before breaking the banks and to review what are deemed to be mean bed levels in a lot of rivers that are based not on any engineered design but rather what the perceived bed level was at some point of time – usually from the 1980 to 1990 period.

There should be some serious investigation into how we can enhance the flow capacity of the rivers to cover the higher flows that are expected. Much of the gravel extraction work that will be required to achieve this can be undertaken at effectively nil cost to ECan by the Gravel Extraction Industry. This would happen during low flow periods where the effects are a lot less than during high flow periods or immediately after flood events.

Higher and more stop banks will be part of an answer but these will come at a cost. Much of the recent damage in the Orari River came from flood waters overtopping the current banks and scouring them out – this could have been relieved by lowering and widening the bed of the river and thus creating a higher flow capacity – Temuka and surrounding areas were very lucky to have avoided being flooded out.

To make this a more attractive option for gravel extractors the current consent process in my opinion needs overhauling. Once there is a flood or extreme event it seems to be fine to have diggers, bulldozers and other equipment working in riverbeds and in flowing water to undertake emergency works with no regard at all to the items that make up all the consent conditions in a gravel extraction permit. There may well be retrospective consents sought for this work after it is carried out but this does not negate the fact that the work has already been undertaken.

It would be much more proactive to look at what is actually happening in these extreme events and to work backwards through the consent process to enable work to take place prior to these extreme events taking place. This would pose the following questions.

- 1/ What work is undertaken during and immediately after these extreme events?
- 2/ What should we be doing to work towards mitigating the effects of these events prior to them happening?
- 3/ What tools do ECan need to achieve the right outcomes?
- 4/ How much can gravel extraction and gravel management assist with the process of creating higher flow capacity in rivers prior to overtopping stop banks and flooding rural and urban areas?
- 5/ How can the consent application process be simplified and only relevant conditions be put in place so that the work that is required can be carried out in an efficient and cost effective manner when river flows are low.
- 6/ How can this work take place with minimal environmental effect and at lowest cost?

There does not seem to be any problem with crossing and working within flowing water in emergency situations but it is very hard to get consents to even cross water to get to gravel beaches and certainly hard to leave what should be a proper river bed level design behind when there are restrictions in working within 5 metres of the water's edge and keeping 300mm above water levels.

One place that working below water levels is allowed is in the Waimakariri River and I guess this is permissible given that the river is so changeable and if not managed correctly can break out and flood parts of Christchurch. The high risk to a larger populated society has been recognised in this instance and this recognition should be applied across a lot of other sites. There may not be as many people involved along other rivers but these areas also have a community to look after and a lot less ratepayers around to pay the inevitable costs once the damage is done.

Nature has absolutely no regard for infrastructure, Government policies, ECan consents and conditions, bird, skink, lizard and grasshopper habitats when we have a flood event. Nature is something that can only be managed to a certain level and never fully controlled but we can put systems in place to make this easier to achieve instead of creating ever ending hurdles and conditions in the consent process. This needs to be looked at and changed so as to enable our Industry to be able to achieve what is a benefit for all of society, taxpayers and ratepayers alike.

In the areas where gravel is available this effectively becomes a community asset due to having resource available within the local area and minimising the cost of transport for the products that are produced from the gravel available from rivers. The average cost of processed aggregate supply effectively doubles with the first 30 kilometres of cart distance and keeps rising with every kilometre of cart distance after that. In the North Island it is not unusual for cartage distances to be getting up to 150 kilometres one way into both Auckland

and Wellington for some materials. This is a massive cost to the taxpayer and ratepayer who ultimately fund all of Government and Local Body spending. This also extends the carbon footprint effect across the region with increased burning of fossil fuels and wear and tear on the roading network.

It is common knowledge that Central Government is imposing legislation and policies that create added cost and effort from ECan to be able to implement and monitor. These policies need to be looked at pragmatically and interpreted in the most simple and common sense way so as to not make the result any more onerous than it has to be. Local Bodies need to be lobbying Central Government so that they can realise the effects that their legislation is having and the cost involved. A book full of legislation has little effect on nature when it comes to floods and extreme events.

My understanding is that ECan has the responsibility for managing Canterbury rivers and whilst there are a considerable number of affected parties like LINZ, DOC, Fish & Game, Bird Protection Societies and others we should be ensuring that these other parties are not taking control or having undue influence on work that should be being carried out as part of recognised river management. I believe that this is already happening to a higher level than it should be. Whilst these organisations are affected parties they are seldom there when the flood damage is apparent and there is a large bill to be paid to put the damage right again – this is again left to the tax payer and the rate payer who also indirectly fund these other organisations.

There are already too many conditions in place that are largely only there to keep these other parties satisfied, quite often with no real positive effect on the environment. I believe that ECan needs to take control of their responsibilities in this instance and not put unrequired conditions on consents just to satisfy these other parties when all this does is add cost and time into the process.

The overall attitude should be “How can we make river management happen in the simplest and most economical manner” instead of over complicating the system with due process, a myriad of conditions to meet with when applying for consents and then another lot of conditions to work under once a consent is granted.

Most long term gravel extraction operators have a high level of environmental compliance at heart, they like to be proud of the job they leave behind as the intention would be able to come back to the site when gravel does replenish over time. Time is spent in creating better breeding grounds for birds, a cleaner wider riverbed for fish, and generally leave the gravel extraction sites in a much better state than what they were before extraction took place.

Part of gravel extraction is gaining permission for access into the various river sites. Most Companies form long lasting relationships with the adjacent land owner for sites that are regularly used. Issues are now arising with LINZ & DOC either refusing access or having no time frame around granting access usually with an attached fee which is making the consent issuing system unworkable and uneconomic for Contractors when only being able to gain consents from ECan for a period of 12 months.

ECan currently have an agreement with LINZ for access to rivers where the gravel extraction is for river management purposes when issuing Gravel Authorisations under an umbrella consent held by ECan – this agreement should be across the board for all river extraction consents and should include DOC as well – again ECan should have responsibility and authority to be able to manage rivers and to grant access across LINZ & DOC land as part of the consent being issued.

Road Metals have some recent experience with getting Iwi and Runanga sign off for a gravel extraction consent in the Rakaia River. One Runanga Group gave their sign off to a relatively small consent whilst the other Group would not give their sign off and wished to be heard at a hearing. Their concerns included lack of availability of gravel in the river bed, the effect of gravel extraction on the New Zealand Coast line and possible effect of coastal erosion, climate change and higher sea levels amongst other items.

It will be well documented through survey work that there is plenty of gravel available in the Rakaia River and that there is build up taking place in certain areas that will have negative effects on surrounding farm land and road and bridge infrastructure in the area. The cost of undertaking studies on all their areas of concern is well outside of the scope of applying for a consent to disturb the bed of the river and should be undertaken and funded by others if this work is to be required. This has the probability of making the option for ECan using gravel extraction as an effective river management tool impossible without this particular Group's sign off. The cost of an Environment Court Hearing to satisfy this Runanga Group makes applying for a relatively small volume gravel consent prohibitive.

Once again I reiterate that ECan needs to take back control of being able to manage the rivers in the best interest of all their ratepayers and taxpayers within Canterbury. Let us go back to the statement from Infrastructure New Zealand - ***“Infrastructure must be prioritised to ensure that community needs outweigh ‘The opinions of a few.’”***

There is plenty of opportunity for ECan and the Gravel Extraction Industry to work together in a closer partnership scenario to undertake work where it is required and where it can enhance river flow capacity as we go forward into the future and we face whatever nature will be putting in our path. I urge this committee and ECan Councillors to take time to look at all the options that may be available as part of an ongoing joint relationship that has largely worked very well over the last 50 years.

Thank you for the opportunity to speak today and for your time in listening.

George Kelcher (Special Projects) Road Metals Co Ltd.
Founding Member of the South Canterbury MOU Group
Member of the Canterbury Gravel Liaison Committee
Past President – Institute of Quarrying New Zealand.
Honorary Fellow -- Institute of Quarrying New Zealand.
Past Executive Member – Aggregate & Quarry Association NZ.

Dan Francis (General Manager)
Road Metals Co Ltd

October 2022

Environment Canterbury Review of the Gravel Management Strategy.

To whom this may concern.

My thoughts on various aspects of river and gravel management by ECan throughout Canterbury.

Currently the allocation of gravel extraction consents in parts of Canterbury is largely ineffective and broken. This is due to lack of ECan staff – especially experienced staff, out of date survey information and the consent system now being outside of statutory time frames for the issuing of consents.

A question to ask is “What was wrong or wasn’t working with the consent process 15 years ago apart from some of the rivers being over extracted – namely the Pareora and the Opihi in South Canterbury?”

The consent system has become overcomplicated with too many so called interested parties having a say in managing rivers when this should be ECan’s responsibility.

I believe we have to go back to basics and review the wider system.

Items that should be permitted activities.

Diversion of water to allow access to gravel beaches in various parts of the rivers. This can be carried out with minimal discharge of sediments if handled the right way.

Installation of culverts where required to cross flowing water when required.

Extracting below water level as long as it is out of the running stream water – closed end extraction as is permitted in the Waimakiriri River – there are methods to undertake this responsibly with minimal sediment discharge.

Being able to extract up to the water’s edge to stop creating false bunds within the bed of the river.

Use extraction to redirect river flows over time under the direction of ECan River Engineering Management – good practice and common sense.

Create future flow channels in the right place that rivers will naturally migrate into during the next higher flow period.

Work towards mitigating the S type flow pattern that develops in rivers with access materials in the centre of the beds – these S patterns attack the river bank protection over time and in doing this move downstream cause erosion to the adjacent land and protection structures.

Let ECan manage the rivers as they were first setup to do without the current interference from other parties that are making river management and gravel extraction to difficult. There are nine Central Govt Departments and ten Canterbury Territorial Authorities involved along with Fish & Game, Forest & Bird, various IWI entities along with others all wanting to have a say on this.

As per the WMIL 2018 potential adverse impacts of gravel extraction activities on riverbed nesting birds in the Canterbury region report. Much more effective for the bird population to do away with the bird surveys and to spend the same amount of money on predator control – This would have a positive effect on a wide range of birds in different areas rather than on the odd bird nest that is occasionally found during surveys – the predators often take the eggs from the nests without any input from the Gravel Extraction Industry.

The current methods and time frames of the river surveys and the compiling of information from these surveys is slow and not up to date. With ever increasing frequency of flood events we need to have up to date information on the state of the rivers to be able to make informed decisions on what gravel may be available. You cannot manage what you don't measure.

Gravel extraction should be under the control of the area River Engineers Division with less input from the ECan Compliance Department to ensure that they can get on with the task including the management of gravel extraction where it would be advantageous rather than waiting until catastrophe strikes.

ECan needs to have the Engineering Team and the Compliance Team on the same page. Engineers need to be managing the rivers and compliance should be helping rather than hindering this process. There are now too many rules that are being applied that do not assist with overall river management.

Looking Ahead --- Due to Climate Change the requirements of rivers will be for higher flow capacity flow channels to handle the effects of ever increasing number of high flow periods and the increasing volume of water from these events that is now becoming apparent. ECan needs to be putting design plans in place now to start working towards this in the near term rather than waiting until catastrophe strikes. Widen the design flow channels and any new protection planting needs to be set back from the current river channels

The costs of gaining consents to extract gravel is now exorbitant, In June 2000 the cost of a short term consent was \$150.00 excl GST and a long term consent for up to 35 years was \$600.00 excl GST. Now the cost for all consents required to undertake the same work is around \$10,000.00 per consent. This is a massive increase that gets added to the cost of the final products and extra costs for Taxpayers and Ratepayers alike – the same people who pay the rates to Environment Canterbury.

The Code of Practice for Gravel Extraction needs to be considered alongside the GMS. These documents were supposed to decrease the number of conditions on consents. The Code currently puts more and more restrictions in place each time it is reviewed and the number of consent conditions continues to increase. A current sample of this is an upcoming requirement to use bridges instead of culverts to cross running water – this is not a practical solution.

Setting of minimum bed levels – some of the historical levels were put in place without having any science attached to the design – rather just set on what the river bed level was at some point in time. All rivers will need to have a design and capacity to be able to carry higher flows more often due to climate change. This is imperative to be able to protect existing land use, roads, bridges and community housing from ever increasing flood levels.

With the current timing that it is now taking to gain a consent and the overall cost involved the Gravel Extraction Industry is looking at walking away from river extraction entirely because it is too difficult and too expensive. This will leave ECan with a lot more problems than what they currently have. The loss of river management through gravel extraction at nil cost to ECan and ratepayers, the loss of revenue from the gravel extraction fee and consent applications will mean a lot of added cost to ECan to undertake similar work that will be required.

ECan will have to increase the cost to Ratepayers as the river management work still has to be undertaken regardless of gravel extraction taking place. Once land base quarries are consented and put in place this provides certainty to the Gravel Supply Industry as we then know what we have available, can supply the ever increasing local markets with aggregates without the uncertainty of where the raw feed resource will be coming from. The Lake Hood Quarry site is a good example of this with the Ashburton River now threatening to flood the Ashburton town due to very little gravel extraction having taken place out of the river in recent years. These examples will only get worse as more floods come along and further gravel is washed downstream

The local riverbeds used to be considered a resource for the local communities surrounding these rivers as a cost effective source of maintenance and construction materials that were a major benefit to the surrounding district. These ratepayers are now faced with longer cart distances, higher delivered prices and eventually a higher rates invoice which will have to cover the river management that our Industry has up till now effectively carried out at nil cost to ECan and the Ratepayers.

George Kelcher (Special Projects)

Road Metals Co Ltd

Deputy Chair of South Canterbury MOU Group

Elected Member on the Canterbury Gravel Liaison Committee

Honorary Fellow of the Institute of Quarrying New Zealand

Past President of IOQNZ

Ex Executive Member of the Aggregate & Quarry Association

Forty Seven years' experience in the gravel extraction Industry