

Submission to Environment Canterbury – Plan Change 7

September 2019

Introduction

This submission to Environment Canterbury is on the proposed Plan Change 7 to the Canterbury Land and Water Regional Plan (LWRP), is made by the Aggregate and Quarry Association of NZ (AQA).

The AQA is the industry body representing construction material companies which produce an estimated 41 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

As an industry body, the AQA would not be directly affected by this issue nor could it gain an advantage in trade competition through this submission. We are making this submission in the interests of the extractive industry as a whole which has an important role to play in Canterbury in supplying essential sand and aggregate necessary for the associated infrastructure development.

We do not wish to be heard on the submission.

Submission

We believe the proposed changes could result in the unintended consequence of resource consent being needed for activities that are unlikely to have adverse effects, specifically the extraction of gravels.

Temporary Discharges

Existing gravel extraction rules in the LWRP provide a sound approach to the management of gravel extraction and its effects on flood protection infrastructure and riverbed morphology.

The proposed rules for temporary discharges where a contaminant may enter water means that resource consent would likely be required for any discharge from gravel processing activities to land where it may enter water; including groundwater which is not at risk from sediment discharges. This means that resource consent would likely be required for an activity with no real effect on groundwater quality.

Ground Water Level

We are also concerned about the definition of highest ground water level. We believe that in determining this level, only relevant and not all available hydrogeological and topographic information, should need to be used.

Where site specific monitoring data over regular intervals exists for a period of 5 years or more, priority should be given to this information in determining this level.

