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Submission by

**Civil Contractors New Zealand**

to the

**New Zealand Government**

on the

**Submission on the discussion document on proposed changes to the wetland regulations**

**October 2021**

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**Introduction**

Civil Contractors New Zealand and its members welcome the opportunity to provide input and feedback on the *Managing our Wetlands* discussion document.

Civil Contractors New Zealand is the national association for civil construction in New Zealand, representing members who work to construct the country’s roads, water and communications networks, public spaces and other civil infrastructure.

Infrastructure impacts on every New Zealanders quality of life. It is essential that we design, build, construct and maintain infrastructure that meets or exceed the expectations of future generations. Infrastructure construction impacts the natural world, from transport network runoff to water network overflow.

**General feedback on the proposals**

Civil Contractors New Zealand broadly supports the intent of the proposals to

* amend the definition of wetland to ensure only those areas intended are captured by the regulations
* providing a consent pathway for certain activities so that development can occur where necessary, while ensuring no net loss of natural wetland extent or values occurs.
* Ensure wetland restoration, maintenance and biosecurity work is undertaken where appropriate or necessary

CCNZ members use aggregate obtained from quarries, and several members are actively involved in remediating, rehabilitating and repurposing former quarry sites. Aggregates are critical to the wider construction industry providing the base for our water and transport infrastructure and being a major input to concrete and other building materials.

In undertaking civil construction activities our members often undertake excavations. These excavations include building transport corridors, building site preparations and foundations, tunnelling and trenching for underground services such as water, energy and communications networks.

The excavated materials require clean fill sites. CCNZ has been advised by members that a shortage of cleanfill sites has created escalating cost issues and also additional carbon emissions due to the need to transport fill longer distances to access sites. The current rules around wetland are part of the problem.

CCNZ supports the importance of protecting wetland areas that have significant benefits to Aotearoa’s flora and fauna. However, we need to balance the needs of that environmental protection with our communities’ social, cultural and business needs.

CCNZ considers any works in or around wetlands should be considered based on the value they have, both for the wetland and for the wider environment and community. Based on this a consenting pathway seems appropriate, but further guidance may be needed to ensure consistent interpretation and application.

**Specific feedback on the proposals**

* Changing the definition of a ‘natural wetland’

CCNZ supports the proposed revision to the wording.

* Change to better enable ‘natural wetland’ restoration, maintenance, and biosecurity work

CCNZ supports the proposed change. Remediation, rehabilitation, and maintenance should all be possibilities in wetlands. The country needs to be able to restore, remediate, maintain and expand wetlands. If properly managed, the changes in the discussion paper can help restore and potentially expand wetland areas by allowing greater community and local authority engagement.

* Additional activities that require consenting pathways

CCNZ strongly supports the proposal to create discretionary consenting pathways for quarrying, landfill, cleanfill, managed fill, mining and urban development.

The intent to have no net loss of natural wetland extent or values is appropriate, and it is clear from the discussion paper that any consenting pathways should be well managed and not reduce or adversely impact natural wetlands.

**Timely infrastructure delivery**

It is typically cited that from the proposal of a large infrastructure project to its final delivery takes approximately 10 years. The regulatory environment that we work in dictates how quickly projects can obtain consents. This process can be very time consuming as the project is consulted with affected parties and if required the process goes through the hearing and possible environmental court process.

The critical phase in the project development is the business case, finance approval and once confirmed the granting of a resource consent. As seen with several recent high profile projects issues of resource consents can lead to delays in the delivery programme and ultimately cost the taxpayer. The role of resource consents is threefold;

• Timeliness of having resource consents in place to allow the project to commence.

• Resource consent conditions granted are not aligned to the outcomes of the project.

• Resource consent conditions affecting the supply chain.

It is important that the consenting pathway proposed wetland does not unduly delay the granting of project resource consents. Programme delivery slippage has significant cost implications. Wetland regulations that enable timely conclusion of issues that arise through the consent process will ensure the timely delivery of infrastructure.

**CCNZ support of quarrying activities**

Civil Contractors New Zealand members all use aggregates as a critical construction business resource and a number of our members operate quarries. Aggregate and therefore quarries are fundamental to the delivery of our infrastructure. Aggregate is the single most voluminous product used on many civil engineering work sites. Where there are restrictions on access this can create delays on project delivery and/or increased project costs. Stability and consistency of supply chain are fundamental to successful delivery.

CCNZ has worked alongside the Aggregate and Quarry Association to produce this submission, and supports the submission put forward by the AQA.