

Submission from the AQA on the Proposed Waimakariri District Plan

November 2021

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing construction material companies which produce 45 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

Funded by its members, the AQA has a mandate to increase understanding of the need for aggregates to New Zealanders, improve our industry and users' technical knowledge of aggregates and assist in developing a highly skilled workforce within a safe and sustainable work environment.

AQA welcomes the opportunity to submit on the [Proposed Waimakariri District Plan](#). We generally support the draft plan change subject to the recommendations which are made in this submission.

Submission

We acknowledge the positive steps taken by Waimakariri District Council to accommodate the quarry sector in the district. However, there are cases identified in this submission, where we think it needs to be more explicit in prioritising quarrying.

The quarry sector has an important role to play in the current and future growth of Waimakariri and the neighbouring districts. This growth requires a supply of sand and aggregate necessary for the associated infrastructure development.

Quarrying is locationally specific. It can only occur where suitable aggregate resource exist. It is therefore important to ensure that access is not inadvertently shut off. The resource is also susceptible to sterilisation by competing land uses and incompatible activities including reverse sensitivity.

Definitions

Quarrying Activity is defined in the National Planning Standards and is included in the definition of **Primary Production**. The definitions of these in the proposed plan are taken from the NPS. We support this.

We note there is also a definition of **Rural Production** which excludes quarrying. We recommend, in order to remove confusion, deleting this definition and using primary production only.

We recommend consistency with the National Planning Standards definitions, throughout the proposed plan.

Earthworks

There is a separate chapter on earthwork activities. Quarrying is a unique activity and should be covered separately from earthworks and that provisions raised in the earthworks chapter (**EW**) should not necessarily apply to quarrying.

To avoid confusion and potential duplication and inconsistency it should be made clear in the **EW** chapter that earthworks associated with quarrying activities are exempt from the provisions in the earthworks chapter as they are specially addressed elsewhere through the relevant zone rules.

Reverse Sensitivity

As stated above, aggregate resource is susceptible to sterilisation by competing land uses and incompatible activities including through reverse sensitivity.

There are places in the proposed plan where more attention is needed to avoid reverse sensitivity sterilising the resource. This is to safeguard the benefit and comfort of neighbouring activities and residents as well as the interests of the quarries.

New residential development areas for example, is a case in point. **UFD-P2**, 'Identification/location of new residential areas' should be amended so that 'reverse sensitivity affects' are included in the list of conditions.

UFD-P10 allows for managing reverse sensitivity effects from new development in certain residential zones but its scope should be widened so that it includes *all* urban or residential development.

Setback Distances

Setbacks are often necessary to minimise reverse sensitivity effects.

GRUZ-R30 states the quarry should be set back a minimum of 1000m from a Residential Zone.

GRUZ-BFS5 states a new residential unit should be 500m from an existing quarry.

We are in support of the framing of the setback distances so that it works in both directions. As stated above, the comfort of neighbouring residents is as important as the interests of the quarries. However, we think firstly, they should be consistent and secondly, that the 1000m setback distance under **GRUZ-R30** is too large.

We would support a 500m setback distance for quarries under **GRUZ-R30** not the proposed 1000m.

Our preference, which we are promoting at a national level is to allow district plans to determine setback distances on a case-by-case basis rather than having prescribed distances specified.

Outstanding and Significant Landscapes and Features

The plan identifies the following Outstanding and Significant Landscapes and Features where “Quarrying Activities” are non-complying activities:

- Waimakariri River - Outstanding Natural Features
- Puketeraki Range and Oxford Foothills - Outstanding Natural Landscape
- Ashley River/Rakahuri Saltwater Creek Estuary - Outstanding Natural Feature
- Ashley River/Rakahuri - Significant Amenity Landscape

Provided quarrying and other primary production activities do not detract from the values identified they should be allowed to occur. Changing the activity status to discretionary in **NFL-R12** would achieve this.

We support the inclusion of the ability to mitigate any adverse effects on significant amenity landscapes as included in **NFL-P4**.

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