

Submission to Gore District Council from the AQA on the Gore Draft District Plan

September 2022

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing construction material companies which produce 50 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.

We would like to thank the Gore District Council for the opportunity to comment on the [Gore Draft District Plan](#). Our submission is restricted to issues impacting on quarrying. The plan is relatively enabling of quarrying and we are generally supportive. We make some comments on some specific provisions of the Draft Plan and some general comments on aggregate below.

General Comments on Aggregate

Importance of Aggregate

Aggregate (crushed rock, gravel and sand) is an essential resource for the construction sector, for housing and transport infrastructure and for climate change adaptation.

Due to unprecedented levels of construction and infrastructure development activity, there is growing demand for aggregate which is in short supply in many parts of New Zealand including Gore and the surrounding region.

Characteristics of Aggregate

Aggregate is a locationally constrained resource. Quarrying can only occur where suitable aggregate resource exists.

It is therefore important that the District Plan does not shut off access to potential aggregate resources. Council planning must identify where the rock is located and protect those areas from other development and alternative land uses.

Due to its weight and volume, aggregate is very expensive to transport. An additional 30km travel typically doubles the cost of aggregate. This highlights that shifting large volumes from outside the region or far from where it is to be used is very expensive and would increase the cost of many of the proposed projects.

Quarrying and the Gore District Plan

Clearly, the quarry sector has an important role to play in providing the necessary aggregate for the current and future growth of Gore and the wider region and it needs to be accommodated in the District Plan. This means planning for new and expanded quarries in Gore and enabling the importation of aggregate from further afield.

Provisions Relating to Quarrying in the District Plan

Definitions

The definitions of **Earthworks**, **Quarry** and **Quarrying Activities** are taken from the National Planning Standards.

We support the use of these definitions and National Planning Standards definitions generally throughout the draft plan to avoid confusion and potential duplication.

General Rural Zone

Quarrying and other mineral extraction activities are supported in the General Rural Zone. This is referenced in the **Overview and Purpose** of the General Rural Zone.

We support **GRUZ-O5** "The value and long-term benefits of using highly productive land for primary production is recognised and the availability of highly productive land for primary production for future generations is protected."

Quarrying is part of the definition of Primary Production in the Draft Plan's Definitions and the National Planning Standards. Land containing minerals and aggregates is highly productive – quarrying generates between 6 and 10 times more revenue per hectare than dairy, beef/lamb or horticulture.

We note that the Government's recently released National Policy Statement on Highly Productive Land extends to quarries, even though it is targeted at agriculture and other soil using industries.

We support **GRUZ-P5** "Manage the environmental and cultural effects of quarrying and mining, whilst recognising the benefits of quarrying and mining activities on the local economy and supporting associated industries."

We are pleased with the reference to the benefits of quarrying. Recognising this is important, particularly in light of the Government's moves in the upcoming resource management reform to plan for positive outcomes and not just manage adverse effects.

GRUZ-R1 relates to Primary Production (which quarrying is a part of under the national Planning Standards definition of Primary Production) but it specifies quarrying and mining activities are not covered by this rule as they are subject to Rules and Standards in the Earthworks chapter EW-R6, EW-R7 and standards EW-S1 to EW-S7. It appears that some of these clauses may have been incorrectly labelled in the draft we have seen (EW-R6).

Earthworks

It is our view that quarrying should be covered separately from the Earthworks chapter in district plans to avoid duplication and confusion. This reflects that quarrying activities are typically significantly different activities from general earthworks. In addition, the definition of earthworks in the Draft Plan, taken from the national standards – which we support, does not specify quarrying.

Only some of the provisions in the Earthworks chapter relate to quarrying. It should be made clearer which provisions in the chapter are intended to capture quarrying and which aren't.

EW-P1 (c) recognises the benefits and necessity of earthworks “associated with rural production and extractive activities, where these are located in the General Rural Zone”. We support the intent of this policy.

EW-R7, Prospecting for and Mining Minerals.

This essentially says earthworks for quarrying is a restricted discretionary activity – we support this – and the matters of discretion.

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