

# Submission from the AQA on the Taupō District Plan Changes

December 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 Taupō District Council for the opportunity to comment on the [Taupō District Plan Changes](#).

The Plan Changes which our comments are most relevant to are:

- [Plan Change 38](#) (Strategic Directions) – a new Strategic Directions chapter; and
- [Plan Change 42](#) (General Rural & Rural Lifestyle Environments) – full review of the Rural chapters, including new provisions for primary production and rural industry.

## Recommendations and Key Points

- We recommend the text, policies and objectives of the Strategic Directions Chapter be amended to recognise the strategic importance of aggregate.
- In the General Rural & Rural Lifestyle Environments, we recommend the use of National Planning Standards definitions to avoid confusion. This is particularly around the area of rural industries and primary production as it relates to quarries.
- As the Rural Lifestyle Environments expand it is important that locations designated for these areas do not clash with areas of quarrying potential.
- The District Plan changes must not shut off access to potential aggregate resources. Council planning must identify where the rock is located and protect those areas

## General Comments on Aggregate

### Importance of Aggregate

This submission focuses on issues in the plan as they relate to the aggregate and quarrying sector.

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 the Taupō district.

### 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. We are happy to assist in identifying such resources.

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.

## Specific Comments on Plan Change 38 – Strategic Directions

We generally support the new Strategic Directions Chapter as drafted in the plan change. The chapter provides an outline of the key strategic and significant resource management matters for the Taupō district.

Many of the themes included in the chapter (e.g. urban form, climate change, and infrastructure) have a connection with aggregate and there is merit in acknowledging this in the district's strategic direction.

### Urban Form and Development

Aggregate and quarries are very relevant to the urban form section of the Strategic Direction Chapter.

Not only is aggregate needed for the construction of urban infrastructure, good planning is required to ensure that available resource is not sterilised by urban expansion. As stated in the earlier comments, aggregate is locationally constrained – it is where it is. Council planning must identify where the rock is located and protect

those areas. It is also expensive to transport, meaning that the risk of reverse sensitivity and these transport costs need to be balanced.

## Climate Change

Aggregates are particularly relevant to the Effects of Climate Change that are identified in this section of the Strategic Direction Chapter.

Aggregates are needed to make infrastructure more resilient to resist extreme weather events. They will be required to build the structures that will protect against the effects of stronger storms, sea level rise and increased flooding on our infrastructure, including sea walls. They will also be at the fore in fixing damage as well as relocation and rebuild of infrastructure and housing. It should also be noted that sand, limestone and aggregates are an essential ingredient in cement and concrete manufacture.

## Infrastructure

The same issues set out above under urban development apply to aggregates and infrastructure. It is an essential component of infrastructure and good planning is required.

In addition to this, just as regionally and nationally significant infrastructure is identified in the plan as requiring attention, the same to quarries due to their regional significance and locationally constrained nature.

## Recommendation

We recommend the text, policies and objectives of these three sections be amended to recognise the strategic importance of aggregate in each of them.

It would be helpful if the chapter linked well to the rest of the plan so that these things had to be taken account of.

## Specific Comments on Plan Change 42 – General Rural & Rural Lifestyle Environments

### New Definitions

We note the document and the plan change and the plan itself does not make much use of the National Planning Standards including in the definitions.

The proposed **definition of 'rural industry' in** the proposed plan change covers quarrying but it is not explicit.

*“an activity that directly supports, services, or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but*

*are not limited to; forestry, agriculture, dairy farming and geothermal/electricity generation."*

The plan uses rural industry rather than 'Primary Production' which is part of the National Planning Standards. This definition of Primary Production includes quarrying.

We recommend the use of National Planning Standards definitions to avoid confusion and potential duplication. This is particularly important around the area of rural industries and primary production as it relates to quarries.

The National Planning Standards definitions of Earthworks, Primary Production, Quarry and Quarrying Activities are particularly important for the sector.

## **New Rural Chapters**

We support the new chapters 3b and 4b which includes objectives and policies and rules and performance standards for the General Rural and the Rural Lifestyle Environments.

We support the intent of the new chapter's provisions which seek to limit the scale of activities within these environments unless they have a locational need to be. This is a sensible approach, consistent with our views on aggregate provision as discussed earlier.

Any activity is permitted if it complies with all the Rural Lifestyle Environment & district-wide performance standards (and is not identified as controlled, restricted discretionary, discretionary or non-complying activity) otherwise, the activity defaults to discretionary. Quarrying will usually be permitted or discretionary, subject to compliance with all performance standards.

As the Rural Lifestyle Environments expand, we agree it will be important that locations designated for these areas are appropriate. As set out earlier in this submission, it is particularly important for our sector that they do not clash with areas of quarrying potential.

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