

Submission from the AQA on the Timaru Proposed District Plan

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 Timaru District Council for the opportunity to comment on the [Timaru Proposed District Plan](#).

Recommendations and key points

The proposed plan is generally supportive of quarrying, but this support could be clearer in places to remove any uncertainty.

We support the Restricted Discretionary Activity Status for quarrying.

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 Timaru 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 Proposed 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 district 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 the Proposed District Plan

Definitions

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

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

Quarrying in the General Rural Zone

We support the thrust of **GRUZ-05** except it needs to more clearly enable quarrying where any adverse effects can be mitigated under the effects management hierarchy.

After 'have no or minimal adverse effects', add words "unless those effects can be mitigated as set out in GRUZ-P6".

The reference to "where the resource exists" implicitly acknowledges that quarrying resources are locationally constrained.

Medium and large-scale quarry activities

GRUZ-P6 provides a consenting pathway for medium and large-scale quarry activities using the effects management hierarchy.

The conditions listed are reasonable and most quarrying activities in rural areas would meet them.

The intent of **GRUZ-P6** should be to allow quarrying in rural areas unless the adverse effects cannot be managed.

As stated above, aggregate is a locationally constrained resource. Quarrying can only occur where suitable aggregate resource exists and so it is important that the proposed plan allows for a case-by-case assessment of each quarrying proposal to be made and the opportunity for any adverse effects to be mitigated.

Small quarries or quarrying in the bed of a river

We support the permitted activity status of **GRUZ-R16**, which relates to **small quarries or quarrying in the bed of a river**.

Where compliance is not achieved, rather than the Discretionary activity status which would apply, it should be Restricted Discretionary. This would be consistent with other activity statuses in the chapter.

Expansion of a quarry

We support **GRUZ-R23** which provides an activity status of Restricted Discretionary for expansion of existing consented quarries.

We support **GRUZ-R24** which provides an activity status of Restricted Discretionary for quarrying not listed in GRUZ-R16 or GRUZ-R23.

Reverse sensitivity

We support **GRUZ-S4** relating to setbacks for sensitive activities.

Due to the nature of extractive industry operations - including noise, vibration and dust, non-compatible land uses, such as residential areas, must not be allowed to encroach upon these operations or their surrounding areas. This is for the benefit and comfort of residents as much as it is to prevent disruption to extractive operations.

We also support the 500m setback provided by **GRUZ-S4** in this regard.

Wayne Scott
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