

# Submission from the AQA on the Proposed Waitomo 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 the Waitomo District Council for the opportunity to comment on the [Proposed Waitomo District Plan](#).

## Key Points

- We support the plan which recognises and provides for quarrying activities. It recognises the locationally constrained nature of aggregate and its importance as an essential resource for the construction, infrastructure and for climate change adaptation.
- We fully support the permitted activity status given to the quarries listed in the scheduled rural production sites **RPROZ-SCHED1**, but newly identified aggregate resource and new quarries outside these scheduled areas should also have a consenting pathway.
- Where there are provisions which apply to different zones and are intended to be the same, we recommend using the same wording to avoid conflict or uncertainty. For example, GRUZ-P12(5) and RPROZ-P4; and GRUZ-P13 and RPROZ-P7.
- We recommend GRUZ-P12(5) ahead of RPROZ-P4; and, importantly, RPROZ-P7 rather than GRUZ-P13 because it recognises meeting mineral and aggregate needs from predominantly local sources is desirable.

## General Comment on Aggregates

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 Waitomo District.

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.

## The Proposed Waitomo District Plan

In this section of the submission, we go through the chapters of the document and comment on issues relevant to aggregate and the quarrying sector.

We generally support the Proposed Waitomo District Plan which recognises the need to plan for aggregate resource but there are some areas where amendments are recommended. We note the Proposed Plan follows the format of the National Planning Standards and we support that.

## Strategic Direction

We generally support the new Strategic Direction Chapter as drafted in the plan change. In particular we support **SD-030**, “Recognise and provide for nationally and regionally significant infrastructure and industry, and for those activities associated with significant mineral resources.”

This is doubly relevant for aggregate resources because it is also a key component of infrastructure, both nationally and regionally significant.

As part of “recognising and planning for” we think it would be helpful if the Strategic Direction Chapter could say more about the council’s need to identify and plan for aggregate resources.

Many of the themes included in the chapter such as urban form, climate change adaptation, and infrastructure have a connection with aggregate (ie it’s needed for all of these) and there is merit in acknowledging the link in it.

## Definitions

We support the use of National Planning Standards definitions throughout the proposed plan. These will help to avoid confusion and potential duplication.

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

## Earthworks

We support the distinctions given to quarrying in the Earthworks Chapter from general earthworks. For example, it specifies that “the provisions of the Earthworks Chapter do not apply to quarrying activities” and says that rules relating to quarrying activities in the general rural, industrial and rural production zones prevail over earthwork rules.

This separation between quarrying and general earthworks is important as quarrying activities are significantly different activities from general earthworks.

## Reverse Sensitivity

We support **GRUZ-P3 (5)**, “Ensure that rural character, amenity and safety is maintained and that reverse sensitivity effects are minimised by recognising that farming, forestry and quarrying activities are an established and accepted component of the rural environment and may generate noise, odour, dust and visual effects.”

This recognises that quarrying activities are an established and accepted component of the rural environment and aims to minimise reverse sensitivity from non-compatible land uses being established in the vicinity, such as residential areas, objecting to the abovementioned effects generated by quarrying.

Non-compatible land uses, such as residential areas must not be allowed to encroach upon quarrying 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.

## Effects Management Hierarchy

We support the intent of **GRUZ-P12** which applies the effects management hierarchy to quarrying activities except we recommend:

1. Deleting the word ‘avoided’ as this could be misinterpreted as not allowing quarrying, and
2. Adding ‘offset’ and ‘compensate’ which are recognised parts of the effects management hierarchy, which will provide additional ways for quarry operators to “internalise” adverse effects.

We support the list 1-11 of matters management methods and rehabilitation plans should address.

We note **RPROZ-P4** aims to achieve the same thing for quarrying activities in the rural production zone. We recommend using the same wording as **GRUZ-P12** to avoid conflict or uncertainty.

## Locally Constrained

We fully support **GRUZ-P13** “When assessing resource consents for quarrying activities, take into account that mineral extraction is constrained by the location of the resource, and it is important to maintain a supply of extracted minerals.”

As stated above in the General Comment, aggregate is a locationally constrained resource and quarrying can only occur where suitable aggregate resource exists. This lack of flexibility means special allowances need to be made for quarrying and where it is located.

We also support **RPROZ-P7** as it applies in the Rural Production Zone which, like **GRUZ-P13**, recognises that quarrying activities are locally constrained. **RPROZ-P7** goes further and recognises that meeting mineral and aggregate needs from predominantly local sources is desirable.

As stated above in the General Comment, aggregate is very expensive to transport and when it is not sourced locally the cost of proposed projects is increased significantly.

This point about the desirability of local sources should also apply to the General Rural Zone and so we recommend using the same wording for both **RPROZ-P7** and **GRUZ-P13** to avoid conflict or uncertainty. We recommend the wording of **RPROZ-P7** because of the recognition of the desirability of predominantly local sources.

### **Scheduled Quarrying Sites**

We fully Support the permitted activity status given to the quarries listed in the scheduled rural production sites **RPROZ-SCHED1**, **RPROZ 1-9**.

Quarrying activities outside these scheduled areas have a Restricted Discretionary status. We support this approach but emphasise because of the locationally constrained nature of quarrying and its importance to the district, both newly identified aggregate resource and new quarries established to meet increased demand must not be overly constrained and retain a consenting pathway.

### **Quarrying Outside the General Rural and Rural Production Zones**

We support the Discretionary Status applied to quarrying activities in the Industrial Zone as provided for in **INZ-R17**. Again, we note, because of the locationally constrained nature of quarrying and its importance to the district, new quarries must not be overly constrained.

The same applies to potential quarries in the Rural Lifestyle Zone and other zones which are not covered in the proposed plan. While we acknowledge the need to separate rural lifestyle and quarrying activities, there should be some allowance for possible quarrying activity (perhaps small scale) given the need to service these areas. Obviously there would need to be strong mitigating factors given the adverse effects, but the potential should not be left out of the chapter.

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