

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

November 2023

Introduction

1. The Aggregate and Quarry Association (AQA) is the industry body representing quarrying companies which produce 45 million tonnes of aggregate and quarried materials consumed in New Zealand each year.
2. 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.
3. We would like to thank the Gore District Council for the opportunity to comment on the [Gore Proposed District Plan \(the Proposed Plan\)](#). Our submission is limited to issues impacting on quarrying.

Key points

4. We broadly support the Proposed Plan. We are pleased it recognises the importance of quarrying. The plan balances well the need for quarry materials in the community and the need to avoid adverse impacts from its extraction and processing.
5. The plan is enabling of primary production generally (which is very positive) and quarrying in particular.
6. However, there is some ambiguity when it comes to quarrying on highly productive land and it is not as enabling here as it should be.
7. The Proposed Plan needs to recognise that like highly productive soils, aggregate resources are 'location specific' and because of the value of these resources, land containing them is highly productive.
8. We recommend that the Council revisit the policies and objectives around highly productive land after planned changes to the NPS-HPL have been made by the incoming Government.

General comments on aggregate

9. Aggregate (crushed rock, gravel and sand) is an essential resource for the construction of housing, roading projects and other transport infrastructure. It is used for general construction – in concrete, asphalt, mortar and other building products.
10. Aggregate is also important for increasing resilience and adapting to extreme weather events and climate change.
11. 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.
12. Aggregate deposits are 'location specific' – limited in quantity, location and availability. They can only be sourced from where they are physically located and where the industry is able to access them.
13. 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.
14. 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.

Highly Productive Land

15. The Proposed Plan has accommodated the requirements of the National Policy Statement for Highly Productive Land (NPS-HPL) which has implications for the quarrying sector.
16. The NPS-HPL places a significant focus on land-based agriculture and reliance on use of the soil.
17. It needs to be noted that land containing quarry materials is also highly productive. In fact, it is significantly more productive than soils used for agriculture because of the value and scarcity of the aggregates produced relative to the value of agricultural commodities.
18. Like highly productive soils, aggregate deposits, can only be sourced from where they are physically located and where the industry is able to access them.
19. The original intent of the NPS-HPL was to protect highly productive land for future primary production. This would include quarrying recognising that other factors in addition to soil determine the productive capacity of land.
20. Furthermore, quarrying is a recognised sector within "primary production" in

everyday parlance and in a number of definitions, most particularly the National Planning Standards definition of primary production.

21. We understand the future of the NPS-HPL is highly uncertain under the incoming Government. The agriculture sector has identified a number of problems with it, and we understand some officials are wanting to repeal it. National policy statements generally are likely to be reviewed as part of the new Government's reform of resource management law. There is also the current consultation under way in the form of the document, [Potential amendments to the National Policy Statement for Highly Productive Land \(NPS-HPL\)](#). Submissions on this closed 31 October 2023.
22. In the next section we identify some objectives, policies and rules which are designed to protect highly productive land but there is ambiguity in some as to whether this is intended to apply to quarrying land as well as farming land.
23. We recommend that the council revisit the policies and objectives around highly productive land after planned changes to the NPS-HPL have been made by the incoming Government.

Specific provisions in the Proposed Plan

Interpretation

24. The Proposed Plan generally uses the National Planning Standards definitions throughout. We support the use of these – specifically those relating to quarrying. The use of these definitions is helpful for consistency and to avoid misinterpretation.
25. The Proposed Plan uses the definition of National Planning Standards of **primary production**, which we fully support. This definition incorporates quarrying as it should.
26. We oppose the definition of **highly productive land**, which is not taken from the National Planning Standards, as it excludes land containing quarrying materials, as discussed earlier.

General Rural Zone – Overview and Purpose

27. We support the Overview and Purpose of the [General Rural Zone](#) chapter in which quarrying activities is specified as being supported in the rural area. *“The rural area supports a range of activities that rely on the land resource. This includes quarrying...”*

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.”

28. We support GRUZ-O5 the way it is worded. It is a recognition of the need to protect highly productive land including potential quarrying land. As stated in paragraphs 15-23 above, land containing quarry materials is highly productive and quarrying is part of the definition of primary production in the Proposed Plan's definitions (as well as the National Planning Standards as discussed).

GRUZ-P5

"Recognise the benefits of quarrying and mining activities on the local economy and supporting associated industries through enabling small scale quarries and mines."

29. We support this policy. In terms of what the benefits of quarrying are, it should be noted these relate to the use quarried products have in the district (as set out in the General comments on aggregate section above) as well as the jobs, revenue, tax and economic contribution etc the quarrying sector makes to the local community itself.

GRUZ-P6

"Manage the environmental and cultural effects of quarrying and mining and avoid quarrying and mining activities that result in adverse cultural or environmental effects that cannot be avoided, mitigated or offset."

30. We support this policy. It is a balanced statement when read alongside GRUZ-P5 recognising the need to carefully manage environmental impacts.

GRUZ-P10

31. GRUZ-P10 is designed to protect highly productive land from inappropriate use so that it doesn't compromise the use for primary production.

32. We support this the way it is worded. Quarrying will often be an appropriate use of land if that is where the resource is located. It is a recognition of the need to protect appropriate land for quarrying.

GRUZ-R1

33. We support GRUZ-R1 as it applies to primary production. However, quarrying and mining are explicitly excluded and quarrying has its own rule, GRUZ-R3, see below.

GRUZ-R3

34. GRUZ-R3 applies to quarrying activities separate from other primary production.

35. It states that quarrying activities have a Permitted activity status, which we support. But where they are to be located on highly productive land, the activity status becomes Restricted Discretionary.

36. As noted throughout the submission, we oppose making this distinction between quarrying and other primary production. We oppose GRUZ-R3 where it relates

highly productive land for the reasons stated in paragraphs 15-23 above.

37. We request that point 3, "The activity is not located on *highly productive land*" be deleted." Or alternatively the definition of highly productive land should be amended to incorporate quarrying land.

Part 2 – District Wide Matters – Earthworks

38. We are pleased that quarrying is covered separately from the Earthworks chapter which was not the case in the Draft Plan.
39. Quarrying activities are significantly broader than just earthworks and there is some risk having it within an earthworks chapter where there is scope for confusion or misinterpretation.

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