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Response Date	Aug 31 22 03:19:45 pm
Notes	AQA
Q1	Select the chapter you want to provide feedback on
	Earthworks
Q2	In general, to what extent do you support the contents of this chapter?
Q3	Objective/Policy/Rule/Standard reference:
Q4	Feedback/Comments
Q5	Objective/Policy/Rule/Standard reference:
Q6	Feedback/Comments
Q7	Objective/Policy/Rule/Standard reference:
Q8	Feedback/Comments
Q9	Objective/Policy/Rule/Standard reference:
Q10	Feedback/Comments
Q11	supporting documents?
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Q12	If you need more space, or have any other general comments, please leave them here

# Submission from the AQA on the Draft Waitaki District Plan

August 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 Waitaki District Council for the opportunity to comment on the [Waitaki District Council Draft District Plan](#).

## The importance of aggregates in Waitaki

The quarry sector has an important role to play in Waitaki District. There are a number of quarries operating in the district.

Not only are the products produced by this sector essential inputs for growth and infrastructure development, quarries in Waitaki directly and indirectly employ many people and contribute significantly to the local economy. In addition to the existing operations, it is important that future opportunities are accommodated. Current and future growth will require access to a supply of sand and aggregate necessary for the associated infrastructure development together with climate change mitigation and adaptation.

## General comments on aggregate

Aggregate is a significant resource for the district, regional and national economies. A sustainable supply of aggregate is essential for continued development - to provide for building, construction and roading projects associated with growth, and to maintain and redevelop existing infrastructure. While demand for aggregate continues to grow across New Zealand, current supplies are being exhausted, mandating a need to provide future supplies.

It is important to note, aggregates are a site-specific resource, which means that extraction can only occur where the resource is found and can be economically extracted and transported to local markets (an additional 30km travel typically doubles the cost of aggregate). Such aggregate resources must be found, subjected to feasibility studies, before necessary approval to extract is secured (involving

consultation with affected parties), prior to extraction, and processing. To find, assess, seek approval and develop a new aggregate extraction and processing site can take many years at significant cost.

Aggregate extraction is a temporary land-use whereby the aggregate material is extracted and processed before the area is rehabilitated to a former use, or an alternative and/or enhanced use. Responsible environmental management using best practice approaches is an integral part of any aggregate extraction and processing venture.

## Comments specific to the Draft District Plan

### Definitions

We support the definitions of 'Quarry' and 'Quarrying Activities' which are taken from the National Planning Standards. We recommend consistency with the National Planning Standards definitions, throughout the draft plan to avoid confusion and potential duplication.

### Earthworks

Quarrying for aggregate activities (including gravel extraction) is addressed in Part B of the Earthworks chapter while general earthworks rules are set out in Part A.

We note and support statements in the Earthworks Chapter (e.g. top of pages 384 and 397) highlighting that quarrying activities are not subject to the general earthworks provisions.

This separation between quarrying and general earthworks is important as quarrying activities are significantly different activities from general earthworks. Ideally, in our view, quarrying should be covered separately from the earthworks chapter in district plans to avoid duplication and confusion, but we are satisfied that the separation into Part A and Part B in the Draft Waitaki District Plan, and the accompanying comments highlighting the distinction, adequately addresses this.

### New quarries in the General Rural Zone

We support the provisions in EW(Q)-P4 which enable quarrying activities to be undertaken in the General Rural Zone.

We note under the wording of subclauses 1 and 2 in the clause (as well as elsewhere in the Draft Plan) adverse effects need to be 'avoided, remedied or mitigated'. We support this but we argue that in keeping with the effects management hierarchy, 'offsetting' and 'compensation' should also be available to companies and need to be included in the wording of these subclauses.

### Activity status in the General Rural Zone

EW(Q)-R5 provides a 'Discretionary' status for quarrying in the General Rural Zone. We recommend it should be changed to 'Restricted Discretionary'. This more enabling

activity status is justified given the growing importance of aggregate and the special characteristics as outlined in the earlier section.

Under a 'Restricted Discretionary' activity status, any proposal would still have to meet specific standards and strict conditions on matters the plan has listed for a consent to be issued.

### **Quarrying in other zones**

Under EW(Q)-P6 quarrying activities are 'discouraged' outside the General Rural Zone (and the Special Purpose Macraes Mining Zone) due to the 'increased sensitivity of these receiving environments'.

We agree with the sentiment that there are places where quarrying is not appropriate due to its environmental impacts. It is important that the term 'discourage' does not translate as 'prohibit'. As pointed out in the comments in paragraph 2 of the general comments on aggregate section, suitably located aggregate is hard to find and so there needs to be a consenting pathway for quarrying activities in zones outside the General Rural Zone.

For example, in the Rural Lifestyle Zone, under RLZ-R, primary production is a permitted activity but quarrying activities (which is included in the definition of primary production in the plan and the National Planning Standards) is specifically excluded. We acknowledge the need to minimise adverse impacts from quarrying in a rural lifestyle zone. However, climate change mitigation, including flood management, new properties and local roads will need access to aggregate and so a consenting pathway should be provided. Such quarrying activities could adequately be considered under the Discretionary Activity Status.

We note RURZ-P1 provides for the maintenance of highly productive land for agricultural, horticultural and primary production. We point out that extraction activities are the most productive of all the activities making up primary production (as per the National Planning Standards definition) given the value of the scarce aggregate resource. Due to its location specific characteristic as set out earlier, land that contains scarce aggregate resource should have access to a consenting pathway.

### **Natural features and landscapes**

Quarrying activities within or on a Significant Natural Feature or Rural Scenic Landscape or Outstanding Natural Feature or Landscape is a non-complying activity (NFL-R11 and NFL-R12).

We recognise the importance of protecting these areas but there may be cases where extraction is needed particularly on a temporary basis following natural disaster or climate change impacts, and the plan needs to be enabling under these circumstances.

We are pleased there is a consenting pathway available under the non-complying status and that the activity is not prohibited. However, we argue the activity status

should be discretionary, not non-complying, as this reflects the right balance between protecting the Waitaki's outstanding and distinctive landscapes vistas and enabling aggregate extraction under the right circumstances.

### **National Policy Statements**

We are conscious that the Waitaki District Council District Plan is being prepared at a time of change with central Government in the process of introducing National Policy Statements for Indigenous Biodiversity and Freshwater (affecting Natural Wetlands). The Council will need to respond to these so that the Proposed District Plan gives effect to these documents.

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