

# Submission on Notified Proposal for Plan, Change or Variation

*Clause 6 of Schedule 1, Resource Management Act 1991*

To: Timaru District Council

**Name of submitter:**

Jeremy Harding, Aggregate and Quarry Association .....  
*[State full name]*

**This is a submission on the following proposed plan or on a change proposed to the following plan or on the following proposed variation to a proposed plan or on the following proposed variation to a change to an existing plan) (the ‘proposal’):**

Proposed District Plan .....  
*[State the name of proposed or existing plan and (where applicable) change or variation].*

~~I could/could not\*~~ gain an advantage in trade competition through this submission.  
*[\*Select one.]*

~~\*I am/am not† directly affected by an effect of the subject matter of the submission that—~~  
~~(a) adversely affects the environment; and~~  
~~(b) does not relate to trade competition or the effects of trade competition.~~  
*[\*Delete or strike through entire paragraph if you could not gain an advantage in trade competition through this submission.]*  
*[†Select one.]*

**The specific provisions of the proposal that my submission relates to are:** *[Give details]*  
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**My submission is:** *[Include whether you support or oppose the specific provisions or wish to have them amended; and reasons for your views]*  
*[If your submission relates to a proposed plan prepared or changed using the collaborative planning process, you must indicate the following:*

- *Where you consider that the proposed plan or change fails to give effect to a consensus position and therefore how it should be modified; or*
- *In the case that your submission addresses a point on which the collaborative group did not reach a consensus position, how that provision in the plan should be modified.]*

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Please see the attached document for our submission.  
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**I seek the following decision from the local authority:** *[Give precise details as this is the only part of your submission that will be summarised in the summary of decisions requested]*

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**I wish (or do not wish) † to be heard in support of my submission.**

*[\*In the case of a submission made on a proposed planning instrument that is subject to a streamlined planning process, you need only indicate whether you wish to be heard if the direction specifies that a hearing will be held.]*  
*[†Select one.]*

**\*If others make a similar submission, I will consider presenting a joint case with them at a hearing.**

*[\*Delete if you would not consider presenting a joint case.]*

We do not wish to be heard.

**Signature of submitter (or person authorised to sign on behalf of submitter)**

*[A signature is not required if you make your submission by electronic means]*

**Date** 15/12/22 .....

**Electronic address for service of submitter:** jeremy@straterra.co.nz .....

**Telephone:** 027 631 6161 .....

**Postal address (or alternative method of service under s352 of the Act):** .....

P O Box 10-668, Wellington 6140 .....

**Contact person:** *[name and designation, if applicable]* .....

Jeremy Harding .....

**Note to person making submission**

1. If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.
2. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
  - It is frivolous or vexatious:
  - It discloses no reasonable or relevant case:
  - It would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
  - It contains offensive language:
  - It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matter.

# 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**  
**Chief Executive Officer**  
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