

Submission on the Proposed Far North District Plan

April 2021

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing construction material companies which produce 45 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.

The Far North is a fast-growing district which has increasing demand for aggregate. High population growth and significant road and housing developments are occurring, and this is expected to continue.

AQA welcomes the opportunity to submit on the [Draft Far North District Plan](#) ("Draft Plan"). We generally support the direction of the Draft Plan subject to the amendments which are outlined in this submission.

In this submission we have provided:

- General comments on the Draft Plan, and
- Specific submission points on the Draft Plan, including suggested recommended amendments, provided in the table below.

General Comments

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.

We have submitted separately on the Far North Long-Term Strategy, *Far North 2100*, focussing on the need to plan for aggregate access over the long term and we encourage you to refer to that.

Draft Far North District Plan

This Draft District Plan has been prepared in line with the government's new National Planning Standards (NPS) and it has a separate overlay for mineral extraction.

In general. The Draft District Plan recognises the importance of quarrying and its provisions are conducive to it. In general, we support the objectives, policies, rules and standards of the Draft Plan as they relate to quarrying although we have some comments as provided in the table below.

Earthworks

We note there is a standalone chapter on Earthworks in the Proposed Plan. It appears as though these provisions could potentially apply to quarrying which could cause issues of confusion. Quarry and quarrying activities have their own specific definitions in the Draft Plan and in the National Planning Standards. Such definitions are discreet from the definition of Earthworks in the National Planning Standards.

Setback Distances

As specified in the table below, we support the proposed setback distances in the Mineral Extraction Overlay and the Rural Production Zone. Setbacks are necessary to safeguard the benefit and comfort of neighbouring activities and residents as well as the interests of the quarries.

However, while supporting the proposed distances in the Draft Plan as reasonable, we are promoting changes at the national level which would allow district plans to determine setback distances on a case-by-case basis rather than specifying prescribed distances.

Table: Specific submission points on the Draft Far North District Plan

REF	Provision	Support / Oppose	Comments
Part 1			
Definitions		Support	We support the use of National Planning Standards definitions used for the following: primary production, quarry, quarrying activities, cleanfill area, and cleanfill material.
Part 2	Mineral Extraction Overlay		We support the inclusion of the Mineral Extraction Overlay
Objectives			
ME-O3 - Ancillary activities	Ancillary activities, including sales of minerals and cement production, are co-located with mineral extraction activities.	Partially Oppose	Some ancillary quarry activities may need to be located away from mineral extraction activities, for example stockpiles, agricultural lime production and secondary processing activities. The need for such separate locations will be dictated by a mix of commercial sense and public benefit.
Standards			
ME-S2	ME-S2 2. Extraction or processing activities including storage and placement of overburden shall not be carried out within 20m of the boundary of the Mineral Extraction resource overlay;	Partially Support	We support the listed internal setbacks in the Mineral Extraction Overlay as set out here. To safeguard the benefit and comfort of neighbouring activities and residents as well as the interests of the quarries and its customers there also need to be setback distances for residential areas.
Part 3	Rural Zones		
Objectives			
RPZ-05	Mining and quarrying activities are provided for where the character and amenity values of the Rural Production zone are maintained.	Support	We support the provision for mining and quarrying activities in the Rural Production Zone
Policies			
RPZ-P4	Allow mining and quarrying, including farm quarries in the Rural Production zone where:	Partially Support	We support the provision for mining and quarrying activities but note Point (b) is ambiguous.

REF	Provision	Support / Oppose	Comments
	(b) the activity is established and managed to minimise, if not avoid, adverse effects on sensitive activities that required a residential amenity to function		Point (b) needs to be clarified to make it clear that it applies to new activities not just established ones
Rules			
RPZ-R21	Expansion of existing consented quarries		
RDIS-2	The expansion does not occur within: 1. 500m of a sensitive activity, General Residential, Rural Residential, Rural Settlement or Māori Purpose zone; 2. 30m of a site boundary.	Partially support	These setback distances are reasonable, and we support them. It needs to be clear that the expansion of residential and other sensitive activities are not able to expand within these distances so that the interests and comfort of neighbouring activities and residents are safeguarded.

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