

# Submission on the Draft General Rural Chapter of the Manawatu 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.

AQA welcomes the opportunity to submit on the [Draft General Rural Chapter](#) of the Manawatu District Plan ("Draft Chapter"). We also make comments on the Definitions Chapter. We generally support the draft provisions subject to the amendments which are outlined in this submission.

In this submission we have provided:

- General comments on aggregate and the Draft Manawatu District Plan, and
- Specific submission points on the draft provisions, including suggested recommended amendments, 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 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).

Without sound planning for quarrying, there is a real risk of losing access to suitable aggregate resource as populations and alternative land-uses encroach on land comprising it. It is critical that quarry resources are identified and protected so they can supply vital construction materials for the long-term benefit of the Manawatu.

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 enhanced use. Responsible environmental management is an integral part of any aggregate extraction and processing venture.

## **Draft Manawatu District Plan**

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.

### **Primary Production**

The Plan is inconsistent with the National Planning Standards in that it does not define Primary Production. Manawatu is an important farming region and so it is understandable the provisions in the General Rural Zone reflect this. However, quarrying is also an essential primary industry as supported by the National Planning Standards which include quarrying in the definition of Primary Production.

While the plan is generally supportive of quarrying, there are places where quarrying seems to be secondary to other Primary Production sectors. To avoid confusion, we would like to see clarification in the plan of quarrying's status in this regard as identified in the table below.

For example, the Plan identifies LUC class 1 and 2 land and soils, but there are factors other than soil quality that determine the productive capacity of land. Quarrying is a highly productive use of land given the resource contained within it and the site-specific nature of aggregates means there is a case for elevating the status of such land, in the same way the Plan identifies LUC class 1 and 2 land and soils.

Furthermore, the LUC 1 and LUC 2 zones cover a wide area, and it is possible access to quality aggregate resource within the zone is precluded.

### **Setback Distances**

As specified in the table below, we support the proposed setback distances for Quarrying Activities. 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, 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 General Rural and Definitions Chapters**

REF	Provision	Support / Oppose	Comments
GRUZ-03	The versatile productive capability of LUC class 1 and 2 soils are protected for enduring future productive use.	Partially support	In addition to class 1 and 2 soils, it needs to be recognised that scarce and valuable aggregates are location specific and the land comprising such resource, once identified, also needs to be identified and protected for enduring future productive use.
GRUZ-P2 5	Enable new rural industries within the General Rural Zone by allowing for activities that: These are not located on LUC class 1-2 land		This provision seems to be badly worded and needs to be clarified. But as per above, land comprising suitable aggregate resource should be identified and protected as much as is practicable.
GRUZ-P3	Restrict non-rural activities that will limit or constrain the establishment and operation of agricultural, pastoral, horticultural and gravel extraction activities, or compromise the versatile capability of LUC Class 1 and 2 soils.	Support	We support the inclusion of gravel extraction activities in this policy.
GRUZ-P5	The character and amenity of the General Rural Zone features: - A predominance of primary production and other rural activities, - A landscape within which the natural environment predominates over the built one, - An environmental contrast and clear distinction between town and country.	Partly support	It needs to be clear in the interpretation of this provision that quarrying is part of the definition of primary production.
GRUZ-P6	Restrict the scale, intensity and location of residential units within the General Rural Zone to ensure the zone's anticipated character and amenity values are realised.	Support	We support but we note, the benefits of restricting residential activities within the General Rural Zone is more than about ensuring anticipated character and amenity values. It will also safeguard the interests of residents due to the potentially adverse effects of industries in the zone.
GRUZ-P11	Avoid the fragmentation of land use capability class 1 and 2 soils into unproductive sizes.	Partially support	In addition to class 1 and 2 soils, it needs to be recognised that scarce and valuable aggregates are location specific and the fragmentation of land comprising such resource, should also be avoided to enable future access and productive use.
GRUZ-P13	Avoid activities that would restrict future use of LUC Class 1 and 2 soils.	Partially support	As per GRUZ-P11 above, activities that would restrict access to scarce and valuable aggregates should also be minimised or avoided.

REF	Provision	Support / Oppose	Comments
GRUZ-P14	Restrict the location and scale of buildings within areas of LUC Class 1 and 2 soils to enable primary production land uses.	Partly support	Given that quarrying should be included in the definition of primary production, clarification is needed in this provision.
	<b>Mineral Extraction</b>		
GRUZ-P16	Provide for mineral extraction in the General Rural Zone to meet the District's and Region's supply needs,	Partially support	We support this but recommend adding <b>the country's</b> supply needs to this list as aggregate is often transported across regional boundaries and extraction will benefit and meet the supply needs of neighbouring regions as well as the District's and Region's needs.
GRUZ-P16 3.	3. It avoids constraining the establishment of activities otherwise anticipated within the General Rural Zone;	Partially oppose	Amend so it reads ... "It <b>minimises and</b> avoids ..." as the word avoid can be interpreted as overly prohibitive. Mineral extraction needs to be anticipated within the General Rural Zone as much as other activities and it shouldn't be subordinate to other industries.
GRUZ-P16 4.	There are measures to internalise effects and avoid conflict and potential reverse sensitivity effects on activities anticipated in the Zone, including primary production and residential activity.	Partially support	We support the need to minimise and internalise effects, but it needs to be clear that "reverse sensitivity effects" work in two directions and there needs to be safeguards so that residential activity and other sensitive activities do not impede on existing mineral extraction activities. We also note our previously made point about the definition of primary production.
GRUZ-P17	Ensure that mineral extraction sites are rehabilitated to: 1. enable use of the land for an alternative permitted or consented activity that provides economic, environmental, social, or cultural benefit;	Support	We fully support this. Responsible environmental management and rehabilitation of quarries is an integral part of any aggregate extraction and processing operation.
GRUZ – R10	<b>Quarrying</b>		
General Rural Zone	Activity Status: Restricted Discretionary Matters of Discretion - It avoids constraining the establishment of activities otherwise anticipated within the General Rural Zone;	Partly support	Amend so it reads ... "It <b>minimises and</b> avoids ..." as the word avoid can be interpreted as overly prohibitive.
GRUZ-S1	Residential Unit Separation Distances – A minimum of 500m from Quarrying Activities	Partly support	We support this proposed setback distance. However, note 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.
	<b>Definitions Chapter</b>		Some of the definitions in the Definitions Chapter need to be more consistent with the National Planning standards to remove areas for potential confusion.

REF	Provision	Support / Oppose	Comments
	<b>Primary Production</b>	Partly Oppose	Primary Production should be defined in accordance with the National Planning Standards.
	<b>Rural Activities</b>		Rural Activities does not seem to be defined meaning there is potential for confusion in relation to the definitions of rural industries and primary production.

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