

# Submission on the Timaru Draft District Plan

November 2020

## 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 [Timaru Draft 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 an important resource for the Timaru 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. In addition to this, extraction will only occur where it can be economically extracted and transported to local markets (an additional 30 km travel cost typically doubles the cost of aggregate).

Such aggregate resources must be found and subjected to feasibility studies before necessary approval to extract and process is secured (involving consultation with affected parties). 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. After all the aggregate material is extracted and processed, 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.

## **Timaru Draft District Plan**

The Draft Timaru District Plan includes revised land use rules and performance standards for the next 10-15 years or so within the Timaru District. It has important implications for the extractive sector. It is one of the first Draft District Plans to give effect to the government's National Planning Standards (NPS).

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 as quarry and quarrying activities have their own specific definition in the National Planning Standards and quarrying is included within the definition of "primary production". Such definitions are discreet from the definition of Earthworks in the National Planning Standards.

The AQA is interested in future growth and planning restrictions that have the potential to adversely affect the general operation of mineral extraction. In particular AQA wants to ensure that:

- Aggregate resources are recognised as a significant and essential resource for development
- New planning provisions do not unreasonably restrict future access to aggregate resources
- New planning provisions provide for an efficient and cost-effective planning process to allow aggregate extraction and processing activities; and
- Development does not result in reverse sensitivity effects constraining existing or future mineral extraction activities.

Failure to adequately plan for future aggregate extraction within Timaru would lead to a substantial increase in costs of aggregate supply as a result of increased transportation costs, and this would have flow-on effects on the cost of development of new and of maintaining existing infrastructure. It would also increase levels of heavy transport on local and state highway roads which will adversely affect the environment, New Zealand's economic productivity and the interests of road users generally.

Sound planning is required to ensure that future access to aggregate resources is sufficiently recognised, provided for, and protected for future generations.

## **Setback Distances**

We support the setback distances as set out in GRUZ R16 and GRUZ R20. However, for the record, we would like to state our preference for an alternative approach which we are promoting at the national level.

Rather than specifying prescribed distances, we believe district plans should allow setback distances to be determined on a case-by-case basis.

There are a number of factors that need to be considered to ensure the benefit and comfort of neighbouring activities and residents as well as the interests of the quarries and its customers. If the environmental effects of quarrying such as noise, dust and vibration etc can be addressed by other parts of the District Plan, then it begs the question as to whether prescriptive setback distances are necessary. Aligning any setbacks with appropriate standards such as noise limits is preferable to prescribed distances.