

Submission

Aggregate and Quarry Association and Straterra To Waimakariri District Council

District Plan Review

6 May, 2019

Introduction

the Waimakariri District Council is reviewing its District Plan and is seeking feedback on its consultation document, [*“What’s the Plan? Shaping the Content of the Reviewed District Plan”*](#).

This brief submission is made jointly on behalf of the extractives sector (mining and quarrying) by the Aggregate and Quarry Association (AQA) and Straterra.

The 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.

Straterra is the industry association representing the New Zealand minerals and mining sector. Its membership is comprised of mining companies (including coal), explorers, researchers, service providers, and support companies.

We acknowledge the positive steps taken by Waimakariri District Council to accommodate the extractive sector in the district and we welcome the opportunity to make this submission.

The extractive sector has an important role to play in Waimakariri. It is important that Waimakariri’s current and future growth is able to be accommodated by a supply of sand and aggregate necessary for the associated infrastructure development. It is also important to ensure that access to a key natural resource of value to the district is not inadvertently shut off.

While at present, there is no mining activity to speak of in Waimakiriri, it would be unwise to shut down the potential for future activity by not making allowance for this in the council’s planning.

Submission

The Discussion Document is relatively high level. It identifies key issues which need to be addressed and signals what the council's thinking is on these issues at this stage, but it does not go into any detail on this. There are a number of areas relevant to the extractive sector which we comment on this submission but to really add value to the process, we would like to meet with the council and discuss in more detail what the responses to these issues could be.

Relevant Areas

Noise – Page 9

The document says the council is considering adding a rule to best manage the effects of quarry blasting.

Currently there are no rules to specifically address that and other activities capable of generating noise. The other examples, specifically identified in the document, include commercial firewood processing, dog boarding kennels, shooting ranges, motor vehicle racing, function venues, and military training.

We accept there is a need to avoid, remedy or mitigate to the extent practical, noise associated with quarrying activities and we support the setting of reasonable noise standards - either general standards or standards associated with particular types of quarrying activities.

Available tools include timing restrictions on operations, and rules around the use of noise barriers such as earth bunds or acoustic fences and equipment type and insulation.

We would like to talk to the council about the best way to introduce rules to manage the effects of quarry blasting.

One suggestion we would like to make at this early stage is to draw your attention to [NV 6.9 in the Table from Whangarei District Council's District Plan](#), which is recognized as the industry standard.

Earthworks – Page 11

The council is considering including new controls to earthwork activities. The document states quarrying is covered separately and the proposals in the document won't apply to

it. This is appropriate as there are a couple of provisions in this section that shouldn't be applied to quarries, inadvertently or otherwise, namely:

- Change provisions to manage the amount of earthworks permissible in a year, such as volume-per-site
- Introduce controls for stockpiling such as height and setbacks.

We reinforce the comment in the document that quarrying is a unique activity and should be covered separately from the section relating to earthworks and that provisions raised here should not necessarily apply to quarrying.

Quarrying – page 12

We are pleased this section of the document makes positive comments on quarrying, noting the importance of aggregate, the fact that it is location specific and the expected increase in demand.

The document signals some areas that need to be changed. For example, the introduction of setbacks and different resource consent requirements for different zones but no detail is given as to what the thinking might be.

With regard to the latter, there is also a case for introducing resource consent requirements for other activities which are potentially impacted by quarries. This would be to avoid reverse sensitivity impacts in the case where new activities are established near existing or potential quarries. For example, acoustic insulation of new residential dwellings could be a resource consent requirement for proposed developments near quarries.

The document proposes introducing rules for quarries to minimise effects on amenity such as noise and traffic, while ensuring aggregate supply is maintained. This is reasonable but the rules must not be onerous and any conditions to limit traffic movements, including timing constraints, must consider the operational requirements of the quarries and ensure aggregate supply is maintained.

Depending on the location and nature of the quarry, the document proposes that setbacks from houses and other sensitive areas and activities be introduced and invites the public to provide their views on what these setbacks should be. This is a currently a topical issue in other North Canterbury districts and so we would be pleased to give you our perspective on this.

The document proposes outlining minimum requirements for assessing proposed quarries such as the provision of environmental management plans and rehabilitation plans.

We support such an approach where minimum standards must be adhered to. The sector applies this approach internally. Of course, what these minimum standards are and how they are set is key and we think it is essential that the sector is closely involved in this process of setting them. Again, we ask that we can meet with you to give our initial views.

Business Activities in Rural and Residential Zones – Page 29

There are a couple of issues of relevance in this section.

The council wants to manage some activities in residential and rural zones more carefully to protect the amenity and function of those areas - including the scale and nature of some business activities that aren't compatible with a rural or residential environment. It says more clarity is needed about what activities can occur in a particular zone.

It is proposing more specific provisions detailing what business activities are permitted in rural and residential zones, what sort of activities need a resource consent, and identify those not expected to locate there. This increased clarity is a good thing.

Conclusion

Finally, we would like to draw your attention to the [RMA Quality Planning Resource on aggregates and quarries](#) which has been produced by the Ministry for the Environment and Local Government New Zealand at the initiation of the AQA. We commend this document to all planners as a way of promoting best practice to deal with the range and scale of resource management issues associated with the aggregate and quarrying sector.