

SUBMISSION FROM THE AQA TO MANAWATŪ DISTRICT COUNCIL DISTRICT PLAN REVIEW DRAFT PROPOSAL

JULY 2020

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.

The Manawatū District Council is reviewing parts of its District Plan relating to the Residential, Village and Rural Zones. We welcome the opportunity to make this submission on the [draft proposals](#) that have been released as part of the review.

Our interest in the review is mainly to do with the proposed creation of a [Rural Production Zone](#), which we support, and the implications that will have for the quarry sector. We hope our comments will be of assistance when it comes to preparing the Rural Production Zone planning provisions.

Summary

- We support the change to a Rural Production Zone, noting that this would enable quarrying activity which comes under the definition of the primary production in the new National Planning Standards.
- Aggregate deposits can only be sourced from where they are physically located and where the industry is able to access them and so the council needs to provide for this in its planning.
- Aggregates are essential inputs for the infrastructure development needed to accompany Manawatū's anticipated growth and for improving resilience to environmental hazards.
- It is important that lifestyle subdivisions and other developments do not preclude the opportunity for future quarrying activities to take place.
- It is essential that within rural production zones, planning provisions do not prevent quarries from being established on land with versatile soils. Quarrying is the most highly productive use of land for primary production in New Zealand.

National Planning Standards

We note that the updated District Plan is being prepared in accordance with the government's new [National Planning Standards](#). Consistent with these, rural areas would be changed to a Rural Production Zone.

Rural Production Zones are described in the National Planning Standards as 'areas used predominantly for primary production activities that rely on the productive nature of the land....' Significantly, the definition of primary production in the new National Planning Standards includes mining and quarrying.

Clearly, the creation of a Rural Production Zone is of relevance to the quarry sector and it is essential that quarries are adequately recognised and provided for within the zone.

The Big Ideas

The consultation material lists three big ideas that are shaping the council's work:

- 1. Looking after the versatile soils which underpin the Manawatū economy*
- 2. A growing, diversifying population with different housing needs*
- 3. The need for resilience in the face of a changing environment*

We discuss each of these here in relation to the quarry sector.

1. Looking after the versatile soils which underpin the Manawatū economy

The consultation material accompanying the draft proposals emphasises that the Manawatū economy is heavily reliant on primary production, which is true, but reference to versatile soils suggests it is alluding to agriculture and horticulture as opposed to quarrying and the extractive sector. It should be noted, that highly productive land is not confined to land comprising versatile soils, it is also land that includes deposits of highly productive mineral resource.

Quarrying is the most highly productive use of land for primary production. Revenue generated per hectare of quarrying land is \$78,000 per annum compared with only around \$7,000 for dairying for example. Aggregates are essential inputs for roading, construction and other infrastructure development.

Aggregate deposits are limited in quantity, location and availability. That is to say, they can only be sourced from where they are physically located and where the industry is able to access them. The Council needs to provide for the location-specific nature of aggregate deposits and ensure potential quarrying land is not sterilised due to housing developments etc.

This means an appropriate distance between residential areas and potential quarry areas is needed to allow for both:

- the nature of extractive industry operations - including noise, vibration and dust, and
- the significant expense of transporting quarry materials from their source to their end use.

Many of the issues facing quarries are the same as other areas of primary production. Unconstrained and unplanned development from growing populations and rural lifestyle encroaches on potential quarrying land. The issues raised in the proposed NPS for Highly Productive Land are relevant in that the availability of highly productive land, including mineral-rich land, needs to be allowed for, for future generations.

In addition to this, the nature of extractive industry operations - including noise, vibration and dust – make it important that non-compatible land uses, such as residential areas, do not 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.

It is also essential that within rural production zones, planning provisions do not prevent quarries from being established on land with versatile soils.

2. A growing, diversifying population with different housing needs

As the council's consultation material points out, Manawatū is experiencing significant population growth which is forecast to continue into the future and new housing and infrastructure, which will accompany this growth, needs to be planned for.

It is important to note that sand and aggregate and other products produced by the quarry sector are essential inputs for construction, housing, roading and other infrastructure. The products of the quarry sector will be necessary to enable Manawatū's anticipated growth as well as be a valuable resource in itself.

Aggregate extraction needs to be allowed for in council's planning to ensure a supply of aggregate can be accessed to meet needs of the construction and infrastructure investment required to enable the anticipated growth in the Manawatū to occur.

3. Resilience in the face of a changing environment

The council's consultation material has identified the need to reduce the risk of natural hazards, including flooding and sea level rise, in the face of a changing environment.

Aggregates will have an important role to play in improving Manawatū's resilience to such hazards. For example, aggregates are needed to strengthen sea walls and provide flood protection. They are needed to make infrastructure more resilient generally to resist greater-intensity storms and extreme weather events. This further highlights the need to ensure that aggregates extraction is planned for in the council's planning.