



Form 5 Submission on a Publicly Notified Plan Change under Clause 6 of the First Schedule to the Resource Management Act 1991

Send or deliver your submission to: Principal Planner
Manawatu District Council
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135 Manchester Street, Feilding 4702

For enquiries phone: 06 323 0000 fax: 06 323 0822 email: districtplanreview@mdc.govt.nz

To Manawatu District Council
Submission on **Plan Change** of the Manawatu District Council Plan

Submitter details

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I **could not** [select one] gain an advantage in trade competition through this submission.

I **am not** [select one] directly affected by an effect of the subject matter of the submission that:

- a) Adversely affects the environment; and
- b) Does not relate to trade competition or the effect of trade competition.

* Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

Submission details

The specific provisions of the proposal that my submission relates to are as follows *(please give details)*

See attached

My submission is that

(State in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made, giving reasons)

See attached

(please include additional pages as necessary)

I/we have included [insert number] additional pages

I/we seek the following decision from the Manawatu District Council *(give precise details, use additional pages if required.)*

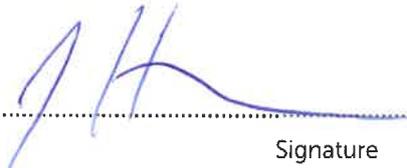
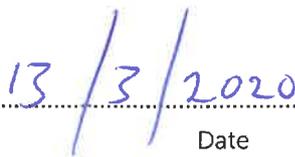
See attached

Submission at the Hearing

- I/we **wish to** speak in support of my/our submission
- I/we **do not wish** to speak in support of my/our submission [select one]
- If others make a similar further submission I/we will consider presenting a joint case with them at the hearing

Signature(s)

Of submitter(s) or person authorised to sign on behalf of submitter(s)

Signature Date

Jeremy Harding for AAA

.....

Signature Date

Important Information

1. The Council must receive this submission before the closing date and time for submissions on this Plan Change or Variation.
2. Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the Plan Change or Variation process.
3. Only those submitters who indicate they wish to speak at the hearing will be sent a copy of the planning report.

For office use only

- post hand delivered

Received at the Council on date time

SUBMISSION FROM THE AQA TO THE MANAWATU DISTRICT COUNCIL

March 2020

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing construction material companies which produce an estimated 45 million tonnes of aggregate and quarried materials consumed in New Zealand each year. We welcome the opportunity to make this submission on Manawatu District Council's (MDC) proposed [Plan Change 65](#) of its District Plan.

The purpose of Plan Change 65 is to protect Manawatu's Outstanding Natural Features and Landscapes (ONFLs) and Significant Amenity Features (SAFs) from inappropriate subdivision, use and development.

We support this aim, but it is important that in providing this protection, future (and current) gravel extraction or quarrying is not inadvertently prevented or restricted. Protecting outstanding natural features and landscapes can be done in a way that doesn't jeopardise essential activities such as quarrying.

As is expanded on below, mineral and aggregate deposits are limited in quantity and location. They are also critical in the district's infrastructure development and building needs.

Submission

This submission argues that:

- provision in the plan should be made for quarrying so it is not captured by the rule that deems it a non-complying activity
- parts of the areas that have been designated Outstanding Natural Features and Landscapes may not fit this description.

The submission also makes some important comments about the nature of mineral and aggregate deposits which MDC should take account of in its planning generally.

Proposed changes will restrict quarry activity

We believe the current rules and regulations set by the Horizons Regional Council in its One Plan (which combines the Regional Policy Statement, Regional Plan and Coastal Plan) are broadly sufficient to govern quarrying and extraction activities and to ensure environmental impacts imposed by these activities are kept to a minimum. Manawatu

District could give guidance in areas such as scale and noise pollution but nothing more than that is required.

Whether intentional or not, the district council's proposed plan changes, as they stand, would unnecessarily and overly restrict quarrying and extractives making it harder for the district to access aggregate essential for infrastructure and construction.

Specifically, we are concerned that rule NFL-R18 (pg. 42), which states that any activity not otherwise provided for as a permitted or discretionary activity will be considered a non-complying activity, will inadvertently capture quarrying or gravel extracting activity. There is a need to specifically provide for quarrying as a discretionary activity, so it is not deemed to be non-complying by fault. This would still require a resource consent before it can be carried out.

The extractives sector is referred to twice in Table 3 of the Section 32 Report (page 20) which sets out potential issues associated with areas identified as ONFLs and SAFs. "Earthworks such as mining, roading or quarrying" are identified as a potential threat to the Ruahine Range, and "earthworks and/or quarrying affecting the integrity of the mudstone cliffs and scallops" are identified as a potential threat to the Rangitikei River.

We argue that not all quarrying activity has these impacts or is a threat to these ONFLs. Therefore, it is unwise to apply rules making it harder to quarry than it needs be. Any risks to both the Rangitikei River and the Ruahine Range are sufficiently managed by the regional council's extraction rules.

In the case of the Rangitikei River, it should also be noted, the quarry sector plays an important role in improving river flows and enhancing stability by removing excess material from the riverbed.

Mapping Outstanding Natural Features and Landscapes

Proper criteria are needed to make sure the land that is mapped and protected truly has outstanding values. Not all land should be mapped, only land that meets strict criteria.

The Ruahine Range Outstanding Natural Area, for example, is very large and it is unlikely that the whole area is needed to be protected in this way.

General points on aggregate resources for council planning

The nature of mineral and aggregate deposits means that they are limited in quantity, location and availability. They can only be sourced from where they are physically located and where the industry is able to access them.

This means adverse effects from their extraction are often impossible to avoid.

So this does not become prohibitive for quarrying, we support a mitigation hierarchy approach, as used in the area of biodiversity management, where companies are

able to provide compensation or offsetting to mitigate adverse effects that by definition cannot be avoided.

It is important that the nature and location of mineral deposits of value to the district, are where possible, identified. Access to such deposits must not be inadvertently shut off through land development and council planning.

Manawatu District's growing economy and population means residential areas are growing and competition for industrial and other land use is increasing. This means that areas of mineral deposits are at risk of being taken out or sterilised by competing land uses.

It is essential that the council takes steps to ascertain such areas within the district planning process and provide for current and future access to aggregate and mineral resources.

Not doing this, could mean lost opportunities for accessing a supply of sand, aggregates and other minerals which are an important input in developing the infrastructure, including roading, that is so necessary to enable the anticipated growth. It could also mean lost opportunities for the local economy in extractive industry investment and jobs.

Determining a reasonable distance for residential areas from potential quarry areas, is essential due to the significant expense of transporting quarry materials as well as the nature of extractive industry operations - including noise, vibration and dust.

AQA is working with central government to increase knowledge of the location of mineral resources in New Zealand and we are able to assist councils to ascertain where such areas lie in their districts.

Given the exact location of mineral deposits is not usually known, a regime which provides for exploration is important, while noting that any development proposal that might arise from that exploration is subject to a rigorous resource consent process under the RMA.