

COMMENTS ON LAND USE RECOVERY PLAN REVIEW

To: Land Use Recovery Plan Review
Environment Canterbury
PO Box 345
CHRISTCHURCH 8140

Contact details

1. These comments to the review of the Land Use Recovery Plan (LURP) are made by **Canterbury Aggregate Producers Group (CAPG)**.
2. CAPG's contact details are:

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3. CAPG authorises AECOM to represent its comments. All correspondence relating to these comments should be directed to:

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Canterbury Aggregate Produces Group

4. The CAPG members are aggregate production and quarry operators from within the Canterbury Region. The members of the CAGP are (in alphabetical order):
 - a. Blackstone Quarries;
 - b. Christchurch Readymix Concrete Limited;
 - c. Fulton Hogan Limited;
 - d. Isaac Construction Co Limited;
 - e. KB Contracting & Quarries Limited;
 - f. Road Metals Limited;
 - g. Selwyn Quarries Limited;
 - h. Taggart Earthmoving Limited; and

- i. Winstone Aggregates Limited.
5. The CAPG undertakes numerous activities in the Canterbury Region including:
 - a. Gravel extraction, both within river beds and within land-based quarries/pits;
 - b. Aggregate processing and storage;
 - c. Land use and infrastructure development and maintenance activities, either directly or on behalf of third parties (including roading contracts for the State Highway on behalf of the NZ Transport Agency, and local roads on behalf of a number of territorial authorities);
 - d. Asphalt and bitumen manufacture and bulk storage;
 - e. Pre-cast concrete manufacture and storage;
 - f. Hazardous substance use, transport and storage; and
 - g. Workshops, transport depots, storage yards, staff offices, and supporting infrastructure (including wastewater, stormwater, and potable water).
 6. The CAPG collectively operates extensive transport fleets of trucks, trailers and other specialised aggregate production and construction equipment across the Canterbury region. The group also employs more than one thousand skilled staff to operate this machinery and plant.

General Submission

7. The CAPG is actively involved in the Christchurch Replacement Plan process (**Replacement Plan**). Much of this involvement relates to the regulatory framework surrounding quarries and aggregate processing. Specifically through its submission on the Replacement Plan, the CAPG are seeking a rule framework that permits aggregate processing to occur at a quarry site once the associated quarry has been exhausted of its aggregate resource. There are a number of reasons for seeking this outcome including:
 - a. the considerable 'sunk' investment of existing processing plant;
 - b. the large size of some processing plants and the significant land requirements should they be required to relocate;
 - c. the mitigation provided by existing sites as opposed to new sites (for example existing plant is located below ground, behind bunds or other visual screens); and
 - d. efficiencies of scale of retaining existing large processing plant where centrally located amongst other quarries as opposed to relying on a series of smaller on-site plant.
8. Through submissions on the Replacement Plan, and subsequent discussions with Christchurch City Council (**CCC**) officers, the CAPG has been made aware that CCC officers feel constrained by the Canterbury Regional Policy Statement (**RPS**) when seeking to provide a positive recommendation on this relief. Specifically this constraint originates from:
 - a. The definition of 'Urban';
 - b. Objective 6.2.1- Recovery Framework;

- c. Policy 6.3.1- Development within the greater Christchurch area; and
 - d. Map A – Greenfield priority areas.
9. While the CAPG does not necessarily agree, CCC officers interpret these matters as creating a situation where:
- a. aggregate processing occurring on an exhausted quarry site (within the Rural Zone) is considered an industrial activity;
 - b. the definition of 'urban' includes industrial activities;
 - c. therefore for the district plan to give effect to the RPS, all industrial activities must occur within an urban area (as defined through Map A or Figure 4 of the LURP).
10. This situation creates a number of issues for the CAPG and the wider community including the reasons for the relief sought through the Replacement Plan review outlined above. In summary these issues include:
- a. the practicalities of locating aggregate processing plant in an urban industrial area. Most significantly the minimum area of land required, would likely be 10 ha¹;
 - b. the cost of industrial zoned land as opposed to rural land;
 - c. the increased costs associated with transport from the quarry site to the processing site;
 - d. the limited opportunities for mitigating effects at an industrial site (for example plant would need to be located at ground level in an industrial site therefore providing no noise attenuation); and
 - e. unnecessary replication and proliferation of aggregate processing activities throughout rural areas to avoid the use of industrial land.
11. It is the CAPG's view that the direction provided by the RPS as interpreted by CCC officers is an unintended consequence of the objectives of attaining a consolidated and intensified urban form for Christchurch². As outlined above there are considerable practical, economic and environmental reasons for allowing aggregate processing to continue to occur on quarry sites once the aggregate resource at the site has been exhausted.
12. If unsuccessful in attaining the relief sought through the Replacement Plan process, the CAPG will need to obtain resource consents for all aggregate processing activities if they are to continue once the associated quarry is exhausted, relocate to urban industrial areas or rely on smaller less efficient processing plant at each quarry site. The CAPG's view is that this is an inefficient and unnecessary use of resources given that aggregate processing activities at these sites have been occurring alongside quarrying for upward of 40 years.

¹ The area of land required necessarily needs to accommodate: raw material stockpiles, complete processing plant (of a size to produce the full range of products being: concrete sand and aggregates, sealing chips and crusher dusts and all types of roading aggregates), settling pond to allow for recycling of cleaning water, stockpiles of all processed products, weighbridge/office and manoeuvring space to allow truck and trailers to enter the site, load and exit the site.

² Objective 6.2.1 and Objective 6.2.2 of the RPS.

Specific Submission

13. Through providing this comment, the CAPG seeks changes to the LURP to remove the potential for the RPS to be interpreted in a way that requires standalone aggregate processing activities to relocate to industrial zones located within the urban area or obtain resource consent so as to continue processing aggregate in the absence of an associated quarry operation.
14. On this basis, the CAPG generally supports Draft Recommendation 3 in that it seeks to reduce the emphasis placed on Map A (Figure 4 of the LURP) and therefore provide less of a constraint to aggregate processors and CCC officers when considering where aggregate processing is best placed to occur.
15. In addition, the CAPG agrees with Section 3.3.3 of the LURP Review: Draft Recommendations Pamphlet insofar as it states: "*development has been unnecessarily and/or inadvertently inhibited [...] through the insertion of Chapter 6 to the CRPS*". The CAPG are of the view that aggregate processing as described above is a pertinent example of this and therefore seeks change through the LURP review to remedy this. For example:
 - a. Amendment to Policy 6.3.1 so as to allow industrial activities that involve a raw material derived from the rural area (for example timber yards and aggregate processing activities as opposed to general industrial activities) to occur within the rural environment;
 - b. Amendment to the definition of 'Urban' to distinguish between general industrial activities and industrial activities relying on rural resources.

Signed on behalf of

Canterbury Aggregate Producers Group



Brian Warren

Chair

28 August 2015