



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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To Manawatu District Council
Submission on **Plan Change** 65 of the Manawatu District Council Plan

Submitter details

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

I am / 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)*

Please see document 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)

Please see document 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.)*

Please see document attached

Submission at the Hearing

- I/we **wish to** speak in support of my/our submission [select one]
 I/we **do not wish** to speak in support of my/our submission
 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

27-02-20
.....

Date

.....
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



BYFORDS

Submission on a Publicly Notified Plan Change under Clause 6 of the First Schedule to the Resource Management Act 1991 – Plan Change 65

The specific provision that my submission relates to:

The inclusion of the Rangitikei River in NFL – APP1 – Outstanding Natural Features and Landscapes (ONFL's) under the proposed Plan Change 65.

And:

Rule NFL-R18, which states that, “any activity not otherwise provided for as a Permitted, Restricted Discretionary, or Discretionary Activity” is to be considered a Non-Complying Activity.

My submission is that:

While Byfords is not opposed to the Rangitikei River – or any Outstanding Natural Features and Landscapes for that matter – being offered a level of protection from inappropriate subdivision or use, we are concerned that the Section 32 Report doesn't appear to make any provision to allow for gravel extraction or quarrying.

Of specific concern is that the proposed plan change appears to directly affect our quarrying site on the Rangitikei River at Otara Road, Ohingaiti. However, our wider concern is that these changes may be used as a precedence in forming later plan changes which could affect other sites.

We believe that the plan change needs provision to allow gravel for extraction and processing operations because there is a social and economic need for gravel extraction and aggregate production.



RMA Section 32 (1)(b)(ii) states that during the plan change process consideration must be given to both the environmental and economic effect of the change.

Byfords Construction 2014 Ltd is one of the largest suppliers of aggregate to the northern Manawatu, Rangitikei and King Country markets. We employ 25 full time staff and are a major contributor to the wider Taihape community and economy – where we are based.

The aggregate we sell is primarily used for local roading projects and concrete production – basic civil infrastructure necessities. And, our experience has been that each year demand continues to grow.

A large portion of the material we sell is sourced and processed from within the Rangitikei River and its adjoining tributaries. In fact, between February 2019 and January 2020, the Manawatu District Council themselves purchased approximately 15,000 tonnes of roading aggregate sourced from the wider Rangitikei River.

Our concern is that through planning and legislative changes local and central government are slowly imposing an increasing number of restrictions which make sourcing material for aggregate production increasingly difficult.

It is well known that any restriction on gravel resources causes the cost of aggregate to increase, and one of the primary reasons is the added cost of transportation.

Given that the cost of aggregate effectively doubles once it has been carted 30km (source: Aggregate and Quarry Association) illustrates the importance of ensuring these resources are available close to their end use.

And given that Council and NZTA use the bulk of the aggregate produced it is clear that any restriction placed on current sources would see a large cost imposition that would then need to be passed on to tax and ratepayers.

Ultimately, restricting access to gravel resources has the potential to have a big impact on, not only our business, but also the end users and community we help support. End users and support businesses such as concrete manufacturers, civil contractors, engineering and mechanical providers; and grocery stores.

Moving Forward, we feel that extraction and quarrying operations in the region require little more than the current regulation that is imposed by the regional council. The regional council's rules ensure that there is minimal impact on the environment, so other than this, the district council really only needs to give guidance around scale and noise pollution to protect the amenity values regarding landforms, or sites of Outstanding Natural Features and Landscapes.



Regarding the Rangitikei River, the Section 32 Report states that the ONFL value is largely attributed to “the dramatic appearance of the river corridor, the prominence, visibility and beauty of the white, sheer, papa (mudstone) cliffs” * and, that there is a risk “earthworks and/or quarrying may affect the integrity of the mudstone cliffs and scallops”.**

We believe that any risk regarding the integrity of the cliffs is already managed by the regional council’s extraction rules.

Rule 17-17, Other Gravel Extraction, of the OnePlan makes any more than 50m³ of gravel extraction a year a Discretionary activity; and one of the main reasons for this is to ensure that over extraction does not cause bed instability.

Table 17.1 of the OnePlan goes further and lists the Long-term Average Annual Allocable Volumes of gravel available for extraction – with consent. These are the volumes that are replenished annually and will not cause bed degradation, instability – or in the case of the Rangitikei, a loss of integrity of the papa cliffs.

The allocable volume under Table 17.1 for the wider reach of the upper Rangitikei is 40,000m³ (roughly 72,000 tonnes/year).

And further to this; it is important to note that there is a cost to not allowing the extraction of this material as it limits the regional council’s ability to manage excess material in the bed of the river. Excess bed material can impact on the stability of the river and potentially put roading networks and bridges under pressure too.

In summary, while it is important to protect the amenity values of the region’s Outstanding Natural Features and Landscapes, careful consideration needs to be given to ensuring that gravel extraction and processing is not overlooked and overly restricted. Not only is there a clear economic and social cost to restricting quarrying works, there is also an environmental cost – excess bed material could actually cause the loss of integrity (to the papa cliffs) that this plan change seeks to protect.

*Table 2 Summary of the key characteristics associated with each ONFL and SAF identified.

**Table 3 Potential Issues associated with the areas identifies as ONFLs and SAFs.

We seek the following decision from the Manawatu District Council:

That provision be made for gravel extraction and portable processing operations in Plan Change 65.



Specifically, that it be a Permitted Activity as long as basic operational guides are met (controlling noise and scale) and consent from the Regional Council has been gained.

