

# Draft first set of National Planning Standards

## SUBMISSION FORM

The Government is seeking views on the draft first set of National Planning Standards.

For more information about the Government's proposals read our National planning standards consultation document available at <http://www.mfe.govt.nz/consultation/draft-national-planning-standards>.

**Submissions close at 5:00 pm on Friday 17 August 2018.**

## Making a submission

You can provide feedback in three ways:

1. Use the online submission form available at <http://www.mfe.govt.nz/consultation/draft-national-planning-standards>. This is our preferred way to receive submissions.
2. Complete this submission form and send it to us by email or post.
3. Write your own submission and send it to us by email or post.

## Publishing and releasing submissions

All or part of any written submission (including names of submitters) will be published on the Ministry for the Environment's website [www.mfe.govt.nz](http://www.mfe.govt.nz). Unless you clearly specify otherwise in your submission, we will consider that you have consented both your submission and your name being posted to the Ministry's website.

Contents of submissions may be released to the public under the Official Information Act 1982 following requests to the Ministry for the Environment. Please advise if you have any objection to the release of any information contained in a submission and, in particular, which part(s) you consider should be withheld, together with the reason(s) for withholding the information. We will take into account all such objections when responding to requests for copies of, and information on, submissions under the Official Information Act.

The Privacy Act 1993 applies certain principles about the collection, use and disclosure of information about individuals by various agencies, including the Ministry for the Environment. It governs access by individuals to information about themselves held by agencies. Any personal information you supply to the Ministry in the course of making a submission will be used by the Ministry only in relation to the matters covered by this consultation. Please clearly indicate in your submission if you do not wish your name to be included in any summary of submissions that the Ministry may publish.

# Submission form

The questions below are a guide only and all comments are welcome. You do not have to answer all of the questions. To ensure your point of view is clearly understood, please explain your rationale and provide supporting evidence where appropriate. The structure of this form is in line with the draft first set of national planning standards as shown in the overview section tables 1 and 2.

## Contact information

<b>Name*</b>	[REDACTED]	
<b>Organisation (if applicable)</b>	Winstone Aggregates	
<b>Address</b>	[REDACTED]	
<b>Phone</b>	<a href="#">Click here to enter text.</a>	
<b>Email*</b>	[REDACTED]	
<b>Submitter type*</b>	Individual	<input type="checkbox"/>
	NGO	<input type="checkbox"/>
	Business / Industry	<input checked="" type="checkbox"/>
	Local government	<input type="checkbox"/>
	Central government	<input type="checkbox"/>
	Iwi	<input type="checkbox"/>
	Other (please specify)	<input type="checkbox"/> <a href="#">Click here to enter text.</a>

# Draft first set of National Planning Standards

## Introduction

1. Winstone Aggregates supports the draft first set of National Planning Standards (The Standards) in principle. The purpose of enabling plans to be changed easily and as a way of integrating national policies consistently is welcomed.
2. We understand this round of The Standards relates more to making the general structure mandatory rather than focusing on content. However, we still wish to highlight a few areas where the standards could be improved to afford the aggregate industry a certain level of prominence that befits its importance.
3. Aggregates are generally recognised as regionally significant resources in existing regional policy statements. In many instances, this is then diminished and diluted throughout regional and district plans, to a level that places quarrying and aggregate extraction as discretionary or non-complying activities.
4. This is contrary to the industry's recognised regional importance and places the industry immediately on the back foot. A considerable amount of time and money is then spent either on extensive professional reports and monitoring or lengthy Environment Court appeals.
5. The Standards present an opportunity for the importance of quarries and aggregates to be recognised throughout all national planning documents and for the issues that the industry face to be clearly outlined and understood.

## Specific Points

6. The Standards have proposed 27 zones. Neither of these zones adequately accommodate the quarrying and aggregate industry. The major constraint for the quarrying and aggregate industry is that the resource can only be extracted from where it exists, whereas development, such as housing is more flexible in where it can be located.

A specific quarry and aggregates zone (or mining zone) as a 28<sup>th</sup> zone would offer protection to existing quarries, but could hamper the industry in the future if a new aggregate deposit is discovered in a zone which requires a plan change.

Therefore, it is recommended that The Standards offer protection to existing quarries and known aggregate sources through an appropriate spatial planning tool that prevents resource sterilisation and incompatible development near these locations. This also decreases the chances of introducing reverse sensitivity issues.

Should this not be workable, it is recommended that quarrying and aggregates (or mineral extraction) be included within the District Wide Matters Standard under S-IE 23 a. The importance of minerals and aggregates to each region and districts prosperity needs to be recognised and is considered appropriate at this level.

7. There are a few issues regarding the definitions, which are –
  - **Cleanfill:** The definition allows for the disposal of exclusively inert, non-decomposing material. This unfortunately includes material such as plastic, fibreglass, fibrous asbestos – all of which are excluded from the well-used MfE definition of cleanfill material. A

more appropriate definition could be – *'means an area used for the disposal of material that when discharged to the environment will have no adverse effect on people or the environment.'*

- **Greywater:** Shower and washing machine water can inadvertently include sewage and can have adverse effects on the environment similar to blackwater (toilet water). This definition should be removed.
- **Quarry:** We support this definition, but it lacks scale and relevancy to what it is trying to define. It could go further to explain the extractive industry activities linked to quarrying, which could be exhaustive (e.g. similar to the Waipa District Plan definition of mineral extraction activities).

## Releasing submissions

Your submission may be released under the Official Information Act 1982 and will be published on the Ministry's website. Unless you clearly specify otherwise in your submission, we will consider that you have consented to both your submission and your name being posted on the Ministry's website.

**Please check this box** if you would like your name, address, and any personal details withheld.

Note that the name, email, and submitter type fields are mandatory for you to make your submission.

## When your submission is complete

If you are emailing your submission, send it to [PlanningStandards@mfe.govt.nz](mailto:PlanningStandards@mfe.govt.nz) as a:

- PDF
- Microsoft Word document.

If you are posting your submission, send it to National Planning Standards, Ministry for the Environment, PO Box 10362, Wellington 6143.

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