

**IN THE MATTER OF** the Resource Management  
Act 1991

**AND**

**IN THE MATTER OF** the Proposed One Plan  
notified by the Manawatu-  
Wanganui Regional Council.

**STATEMENT OF EVIDENCE OF AMBER KATHLEEN BROWN**

**1.0 INTRODUCTION**

- 1.1 My name is Amber Kathleen Brown and I am a Planner in the Wellington Branch of Harrison Grierson Consultants Limited.
- 1.2 I have a Bachelors Degree in Geography completed in 2003 and I have begun my Masters in Planning Practice. I have three years experience in planning and resource management. I have worked as a planner in both the private and public sector, including work for a territorial authority in Melbourne, Australia.
- 1.3 In my role as a planner in Harrison Grierson's Wellington Planning team, I have worked on a range of projects including processing resource consents for local authorities and working with telecommunication providers, central government ministries and agencies, land developers and small private clients.
- 1.4 I appear in connection with the submissions lodged on the Proposed One Plan by the Aggregate and Quarry Association of New Zealand (Inc) (AQA). Harrison Grierson Consultants were engaged by the AQA to prepare submissions on their behalf to the Proposed One Plan. I have been engaged by the Association to present evidence in relation to these submissions.
- 1.5 I have read the Environment Court Consolidated Practice Note 2006 and agree to apply it as if it was a duty to the hearing panel. I understand that as an expert witness I have an overriding duty to assist the hearing panel impartially on relevant matters within my area of expertise. Except where I state that I am relying upon the specified evidence of another person, my evidence in this statement is within my area of expertise. I have not omitted to consider material

facts known to me that might alter or detract from the opinions which I express.

## **2.0 EXECUTIVE SUMMARY**

- 2.1 Minerals and aggregates are not specifically provided for in the Proposed One Plan. Hard rock aggregates such as gravel are subject to extraction and processing activities in the region. This aggregate is used primarily by the building industry in the construction of our towns and cities and infrastructure. As such it is important that this resource is specifically provided for in the One Plan to protect it and ensure that it can be mined and managed properly as appropriate. Sections of the Auckland Regional Policy Statement and Waikato Regional Policy Statement have been provided as appendices to show examples of how this resource can be provided for in a Regional Policy Statement. Both sections provide an overview of the nature and location of the resource in the region and provide for its use and management through objectives, policies and methods. In adopting such a section in the One Plan the use and management of aggregates and minerals can similarly be addressed.
- 2.2 The extraction and processing of minerals and aggregates can only occur in fixed locations i.e the location of this resource cannot be changed and its supply is finite. If new development occurs within close proximity to extraction and processing activities reverse sensitivity effects are likely to result on the new development. If new development occurs within close proximity to extraction and processing activities it is possible that the only way adverse effects on the development could be mitigated would be to prevent or limit the extraction and processing of minerals and aggregates in these locations i.e. the net result will be that the very materials needed for construction are not able to be sourced locally. This in turn could have an adverse economic impact on the region, through the reduction in jobs locally and the cost associated with needing to source these materials elsewhere. This is a matter that must be addressed in the Regional Policy Statement. It is important to identify the issues, objectives and policies of extraction and processing activities in relation to the potential for reverse sensitivity effects. Council needs to consider the values and benefits that extraction and processing of minerals provides to the region as directed by Section 30 of the Act and in doing so address potential reverse sensitivity effects from development on the extraction of this resource.
- 2.3 A mineral and aggregates strategy should be developed by the Regional Council in conjunction with other stakeholders. Such a strategy would provide certainty to the public, the industry and end users on the location and scale of the

extraction and production of aggregates and minerals and its importance and value in the region. The strategy will also provide guidelines to help ensure that best site practice is implemented by the industry. In order to meet the purpose of Regional Policy Statements as set out under Section 59 of the RMA the Council must recognise the need for, and assist with the development of a minerals and aggregates strategy.

- 2.4 Minerals and aggregates are essential for the development of New Zealand generally. Minerals of economic value in the Manawatu-Wanganui region include aggregate resources such as gravel extracted from river beds and rock extracted from quarries. This resource is both of regional and national importance and as land disturbance is inherent for the extraction of minerals and aggregates I believe that it should be generally allowed by being included in Policy 12-3 or alternatively included as a new policy within a new minerals and aggregates section in the One Plan.
- 2.5 'Gravel' should be included in the Social/Economic section of table 6.2 and Schedule D. Gravel build up in beds of rivers and lakes can have detrimental effects to adjacent properties. The build up of gravel can cause flooding and can change the direction of rivers effecting the land through which it passes. Enabling the management of the amount of gravel and smaller sediment in rivers through gravel extraction would aid in avoiding and mitigating adverse effects this build up might cause on the surrounding environment. It is further important to note that gravel holds an economic value, and to manage its levels in the beds of rivers and lakes and use the gravel resource for production would be economically beneficial to people and communities of the region. Including 'Gravel' in the Social/Economic section of table 6.2 and Schedule D would be consistent with the direction of Section 5, including Section 5(2)(c) of the Act.
- 2.6 Member companies of the AQA have many existing local authority resource consents that require the rehabilitation of sites as a condition of consent. Rehabilitating sites often involves cleanfill of greater than 2,500m<sup>3</sup>. By restricting the limit of cleanfill to 2,500m<sup>3</sup> per site per annum under clause (b) of rule 13-9 may mean that the conditions of these existing local authority resource consents for rehabilitation may not be able to be met without the need for a further consent from the Regional Council. This would cause delay and may in fact prevent the rehabilitation of sites from occurring. In any event it would certainly result in additional and unnecessary cost being borne by members of the AQA.

- 2.7 The One Plan proposes as clause (d) of rule 13-19 to require as a condition the recording of the source and composition of all cleanfill material disposed of on site. To record the source and composition would be unduly onerous and prescriptive. Provided that mineral operators, who are rehabilitating their site, meet the requirements of clause (a) of rule 13-19, there is no significant benefit derived from keeping records of where all deposited material comes from, as well as recording its composition. To be precise about composition would require sample laboratory testing of all deposited material. Such a process would be very onerous and expensive for operators and would provide minimal benefits, far exceeding the costs incurred. Under section 7(b) of the Act, the Regional Policy Statement needs to consider the efficient use and development of this resource and I believe clauses (b) and (d) of rule 13-19 do not achieve this. Clause (b) of rule 13-19 should be amended to provide for greater than 2,500m<sup>3</sup> in annual cleanfill deposition for aggregate operators and clause (d) of rule 13-19 should be deleted in its entirety.
- 2.8 We further submit to provide such consequential or other relief required to give effect to all of the stated submission points. The Officers recommendation in regards to this submission point is to accept this submission in part. It is not known what relief will be proposed by officers in relation to several of the submission points however, if Council were to recommend differing relief options to the submission points raised that would still achieve the objective of each submission point, this would be favourable.

### **3.0 SCOPE OF EVIDENCE**

- 3.1 My evidence is divided into two parts. In Part One, I provide an overview of the planning basis that underpins the AQA's submission. This includes consideration of Part II of the Resource Management Act (RMA) and the key role and purpose of Regional Policy Statements (RPS).
- 3.2 In Part Two of my evidence, I will guide you through the specific AQA submissions. Please note I will be addressing the entire submission of the AQA.

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## **Part One - Background to the Aggregate and Quarry Association of New Zealand (Inc) Submissions**

### **4.0 THE RESOURCE MANAGEMENT ACT**

4.1 The Hearings Panel will be aware that in making its decisions on submissions, Part II of the RMA requires it to, among other things:

- Promote the "sustainable management" purpose in Section 5; and,
- Have particular regard to the matters in Section 7.

4.2 I shall comment on these matters in relation to AQA's submissions that the proposed One Plan should explicitly recognise the use of the regions aggregate resource as a significant issue and include objectives and policies accordingly. By not explicitly mentioning a section or subsection of Part II it is not my intent to disregard the significance of those provisions. However, my purpose is to highlight those provisions of Part II which go to the RMA's enabling presumption and which, in doing so, go to AQA's submission that it is relevant to recognise and provide for the extraction and use of aggregates within the RPS.

### **Section 5, Purpose of RMA**

4.3 Section 5 of the RMA provides that the purpose of the Act is to promote sustainable management of natural and physical resources. "Sustainable management" is defined to mean:

*"... managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural wellbeing and for their health and safety while –*

*(a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*

*(b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*

*(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment."*



- 4.4 Section 5 requires Council, in making its decisions on the proposed One Plan, to make an overall judgement as to whether the proposed provisions would appropriately enable people and communities to achieve their well-being, health and safety, both now and in the future. Aggregates play an essential part in the lives of everyday New Zealanders. Without an ongoing supply of aggregate; the development of buildings, roads, motorways, all infrastructure and the production of concrete would stop. The aggregates and minerals resource is not specifically provided for in the Proposed One Plan and as such it does not provide an appropriate policy framework to enable people and communities to provide for their social, economic and cultural wellbeing.

### **Section 7, Other matters**

- 4.5 The Council is required by Section 7 of the Act to "have particular regard" to the specified "other matters" listed in that section which, in connection to the AQA's submissions, relate to:

*(b) efficient use and development of natural and physical resources; and,*

- 4.6 Section 7 (b) requires Council to have particular regard to the efficient use and development of natural and physical resources when considering the provisions of the One Plan. As already noted, aggregates are an essential resource for community well being. The ability to extract this resource efficiently is therefore a relevant issue to be addressed in the One Plan. At present the Proposed One Plan does not address this and only seeks to manage the adverse effects of the activity.

## **5.0 THE FUNCTION OF REGIONAL POLICY STATEMENTS**

- 5.1 Section 59 of the Resource Management Act (RMA) sets out the purpose of RPSs as follows:

*"The purpose of a regional policy statement is to achieve the purpose of the Act by providing an overview of the resource management issues of the region and policies and methods to achieve integrated management of the natural and physical resources of the whole region".*

- 5.2 This reflects the functions of regional councils under the RMA, which section 30 states to be, among other matters:

*"The establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the natural and physical resources of the region..."*

- 5.3 These sections of the RMA require that, in order to achieve the purpose of the Act Regional Policy Statements must provide an overview of resource management issues and set policy direction for the region. Further, sections 67 and 75 of the RMA require that regional plans and district plans must give effect to Regional Policy Statements.
- 5.4 The emphasis on integrated management in Section 30 of the RMA requires Council to consider the values and benefits from the use and development of the regions natural and physical resources. For this to be achieved, Council must recognise these resources as a significant resource management issue for the region. In order to achieve integrated management, Council needs to develop policy under the direction of Part II of the RMA and provide explicit direction on how the enabling and the management functions of Part II will be achieved in the region's specific context.
- 5.5 As minerals and aggregates are not specifically provided for in the Proposed One Plan it is considered that the values and benefits from the use and development of this important regional resource is not fully recognised or provided for. As such I consider that the Proposed One Plan does not fully achieve the requirement of the function of regional policy statements.

## ***Part Two – Aggregate and Quarry Association of New Zealand (Inc) Submissions***

### **6.0 INTRODUCTION**

- 6.1 This part of my evidence addresses the AQA's specific submissions. The relevant AQA submissions seek:

- Either the inclusion of a specific section similar to those attached to the evidence as Attachment A (Auckland Regional Policy Statement) and Attachment B (Waikato Regional Policy Statement), to make specific provision for mineral/aggregate resources and extraction and processing activities or inclusion within section 3 (Infrastructure, Energy and Waste) of part I of the One Plan a similar section to those attached to the

evidence as Attachment A and B, to make specific provision for mineral/aggregate resources and extraction and processing activities. Thus the section would become *Infrastructure, Mineral/Aggregate Extraction, Energy and Waste*.

- Appropriate identification and inclusion of issues, objectives and policies in relation to reverse sensitivity effects, to ensure that these are appropriately recognised and provided for, particularly in relation to mineral/aggregate extraction activities.
- Include mineral/aggregate resources in the methods section (3.5) or an equivalent section relating only to minerals/aggregates so as to ensure that a Mineral/Aggregates Strategy is a project that is developed by the Regional Council, territorial authorities and the industry itself. This would identify the location and extent of all of the regionally significant mineral and aggregate resources within the region and also identify those sites that are under specific pressures from reverse sensitivity issues.
- Include a reference to mineral/aggregate resources in policy 12-3 ('Important and essential activities').
- Include 'gravel' resource in the Social/Economic section of table 6.2 (pg 6-9) and Schedule D.
- Amend clause (b) of rule 13-19 to provide for greater than 2,500m<sup>3</sup> in annual cleanfill deposition for aggregate operators.
- Delete clause (d) of rule 13-19 in its entirety.
- Such consequential or other relief required to give effect to this submission.
- Please note submission 230/6 is withdrawn.

**AGGREGATE AND QUARRY ASSOCIATION OF NEW ZEALAND (INC)**  
**SUBMISSION 230/1**

6.2 The Proposed One Plan for the Manawatu – Wanganui Region makes no specific provision for minerals or aggregates. Very little reference to mineral or aggregate resources, or extraction and processing activities is made throughout



the document generally. This is notwithstanding the mineral resources in the region and the production and consumption of aggregates in New Zealand. It is of note that in 2006 alone, 46 million tonnes of aggregates were produced in New Zealand with a worth of \$558 million. New Zealand has the 5<sup>th</sup> highest rate of aggregate production in the world.

No recognition is given to mineral extraction and aggregates, despite these being critical resources that have significant importance in the development of the region. For example, without minerals and aggregates there are no raw materials to develop infrastructure that is important to the community. Transport infrastructure such as roads, railways, paths, airports, sea ports, together with water supply, stormwater and wastewater networks all have substantial built components requiring minerals and aggregates.

6.3 The Aggregate and Quarry Association of New Zealand (Inc) has made submissions as it believes aggregates and minerals should be appropriately recognised and provided for in the One Plan.

6.4 The AQA's submission notes that other industries have been given such recognition. For example, infrastructure and energy are two key aspects of the region that are given particular attention in part 3 of the One Plan. Object 3-1 states:-

*" Resource use activities associated with the provision, maintenance and upgrading of infrastructure and/or with the use of renewable energy, will be recognised and enabled."*

***Further submissions on the Aggregate and Quarry Association of New Zealand (Inc) submissions***

6.5 The Minister of Conservation has submitted in opposition to this submission. The reason for this opposition is that the Minister believes that provisions of the Proposed Plan will better achieve the purpose of the Act.

***Conclusion on submission***

6.6 The Officers report in regards to this submission point has not yet been provided.

6.7 I agree with the AQA's submission. Aggregates and minerals are a known resource in the region and overall production and consumption in New Zealand

is considerable. These are critical resources that have importance in developing the region. As such, I consider the resource to have considerable values and benefit and therefore should be appropriately recognised and provided for in the One Plan in order to achieve the purpose of Part II of the Act, that is to enable people and communities to provide for their social, economic and cultural well being.

### ***AGGREGATE AND QUARRY ASSOCIATION SUBMISSION 230/2***

- 6.8 A major issue facing the viability and ongoing operation of mineral and aggregate processing activities is the potential for pressures from “sensitive” land uses (e.g. new dwellings, subdivision etc) located in close proximity to extraction and processing activities, and sites with known mineral/aggregate resources.
- 6.9 The AQA has submitted to request the appropriate identification of issues, objectives and policies in relation to the potential for reverse sensitivity effects, to ensure that these are appropriately recognised and provided for, particularly in relation to mineral/aggregate extraction activities.

### ***Further submissions on the Aggregate and Quarry Association of New Zealand (Inc) submissions***

- 6.10 Both Rangitikei Aggregates Ltd and Horticulture New Zealand have made further submission in support of the AQA submission.
- 6.11 Horticulture New Zealand supports this submission and requests that reverse sensitivity is adequately addressed in the Plan, but to a range of activities, not just mineral extraction.

### ***Conclusion on submission***

- 6.12 The Officers report in regards to this submission point has not yet been provided.
- 6.13 The extraction and processing of minerals and aggregates can only occur in fixed locations i.e the location of the resource cannot be changed. If new development occurs within close proximity to extraction and processing activities it is possible that the only way adverse effects on the development could be mitigated would be to prevent or limit the extraction and processing of minerals and aggregates in these locations i.e. the net result will be that the

very materials needed for construction are not able to be sourced locally. This in turn could have an adverse economic impact on the region, through the reduction in jobs locally and the cost associated with needing to source these materials elsewhere.

- 6.14 This is a matter that must be addressed in the Regional Policy Statement. It is important to identify the issues, objectives and policies of extraction and processing activities in relation to the potential for reverse sensitivity effects. Council needs to consider the values and benefits that extraction and processing of minerals provides to the region as directed by Section 30 of the Act and in doing so address potential reverse sensitivity effects from development on the extraction of this resource.
- 6.15 I believe Horticulture New Zealand would also benefit from reverse sensitivity being adequately addressed in the One Plan. However, horticultural activities are not site specific unlike the location of aggregates and minerals. Therefore, I believe that our submission the potential effects on the aggregates industry are much more important and warrant peculiar attention in the One Plan.

### ***AGGREGATE AND QUARRY ASSOCIATION SUBMISSION 230/3***

- 6.16 The location and extent of all of the relevant regionally significant mineral and aggregate resources within the region and those sites that are under specific pressures from reverse sensitivity issues is not provided for in the Proposed One Plan for the Manawatu – Wanganui Region.
- 6.17 The Aggregate and Quarry Association of New Zealand (Inc) has submitted to request this is addressed by including mineral/aggregate resources in the methods section (3.5) or an equivalent section relating only to minerals/aggregates so as to ensure that a Mineral/Aggregate Strategy developed by the Regional Council, territorial authorities, the industry itself and end users and should aim to:
- identify the location of aggregate resources;
  - identify the extent of resource available;
  - provide site management practice guidelines that addresses;

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- transport routes
  - dust control
  - noise control
  - sedimentation
  - hours of operation
  - remediation/reinstatement

***Further submissions on the Aggregate and Quarry Association of New Zealand (Inc) submissions***

- 6.18 Transit New Zealand has made a submission in support of the Aggregate and Quarry Association (Incs) submission.
- 6.19 Transit New Zealand support this submission for the reason that a strategic focus on aggregates within the region is likely to assist in providing more certainty to the industry and to end users.

***Conclusion on submission***

- 6.20 The Officers report in regards to this submission point has not yet been provided.
- 6.21 I believe it is important that a strategic project is developed as this will provide certainty to the public, the industry and end users on the location and scale of the extraction and production and its importance and value in the region. The project will also provide site practice guidelines so best site practice is implemented by the industry.
- 6.22 As aggregates and minerals are a finite resource the extraction and production is a resource management issue that is relevant to the region. In order to meet the purpose of Regional Policy Statements as set out under Section 59 of the RMA the Council must assist with the development and implementation of a minerals and aggregates strategy.

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**AGGREGATE AND QUARRY ASSOCIATION SUBMISSION 230/4**

- 6.23 No special provision is given to land disturbance and vegetation clearance needed for mineral extraction activities. As land sourced minerals and aggregates exist in fixed locations, there may be no alternative to extracting a particular resource. The extraction process often involves significantly more than 1,000 cubic meters of land disturbance per year and where necessary can require vegetation clearance.
- 6.24 Because of its special nature in terms of geographic positioning and the contribution that minerals and aggregates make to the community, it is appropriate for special provision to be given in policy 12-3 ('Important and essential activities'). The Aggregate and Quarry Association of New Zealand (Inc) has sought to address this by submitting to include a reference to mineral/aggregate resources in policy 12-3.

***Further submissions on the Aggregate and Quarry Association of New Zealand (Inc) submissions***

- 6.25 No further submissions have been made on this submission.

***Conclusion on submission***

- 6.26 Within the land hearing report the Officers recommendation in regards to this submission point is to reject this submission and amend Policy 12-3 to:

*The Regional Council will generally allow vegetation clearance\* or land disturbance\* associated with the provision of infrastructure of regional and national importance (as defined in Policy 3-1) and natural hazard management.*

- 6.27 Minerals and aggregates are essential for the development of New Zealand generally. Those minerals of economic value in the Manawatu-Wanganui region include aggregate resources such as gravel extracted from river beds and rock extracted from quarries. As such this resource is both of local and regional importance and as land disturbance is inherent for the extraction of minerals and aggregates I believe it should therefore be generally allowed by being included in Policy 12-3.



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**AGGREGATE AND QUARRY ASSOCIATION SUBMISSION 230/5**

- 6.28 The particular resource that is provided by naturally occurring gravel within the beds of rivers and lakes is not recognised and provided for in the One Plan. In their submission AQA note that in some cases, gravel extraction actually plays a positive role in 'regulating' the amount of gravel and smaller sediment in rivers, thus controlling their migration to ensure adjacent properties are not unduly damaged.
- 6.29 AQA therefore seek the inclusion of 'gravel' as a resource in the Social/Economic section of table 6.2 and in Schedule D.

***Further submissions on the Aggregate and Quarry Association of New Zealand (Inc) submissions***

- 6.30 The Minister of Conservation has submitted in opposition to this submission. The reason for this opposition is that the Minister believes the provision in the Proposed Plan should be retained subject to any amendments sought in the Minister's submission.

***Conclusion on submission***

- 6.31 The Officers report in regards to this submission point has not yet been provided.
- 6.32 I believe 'gravel' should be included in the Social/Economic section of table 6.2 and Schedule D as the effects of gravel build up in beds of rivers and lakes can have detrimental effect to adjacent properties. The build up of gravel can cause flooding and a change in the direction of rivers effecting the land through which it passes. Enabling the management of the amount of gravel and smaller sediment in rivers through gravel extraction would aid in avoiding or mitigating adverse effects this build up might cause on the surrounding environment. By including 'Gravel' in the Social/Economic section of table 6.2 and Schedule D would see Council meeting the purpose of Section 5(2)(c) of the Act.
- 6.33 It is further important to note that gravel holds an economic value, and to manage its levels in the beds of rivers and lakes and use the gravel resource for production would be economically beneficial to the AQA and the region.

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**AGGREGATE AND QUARRY ASSOCIATION SUBMISSION 230/7 AND 230/8**

- 6.34 Some member companies of the AQA have existing resource consents for cleanfill activities that permit considerably more than 2,500m<sup>3</sup> of deposition cleanfill per site per annum. Some of these consents have conditions requiring that the sites be rehabilitated. The AQA is concerned that rule 13-19(b) 'Discharges of cleanfill' that limits the rate of cleanfill deposition to be no more than 2,500m<sup>3</sup>/y per property could mean that the consent conditions of existing local authority resource consents that relate to rehabilitation could not be met without seeking a further resource consent from the Regional Council. The AQA's submission notes that this requirement would be unduly onerous and will not result in environmental benefits beyond what is already being achieved by the required rehabilitation.
- 6.35 The One Plan proposes as clause (d) of rule 13-19 to require as a condition the recording of the source and composition of all cleanfill material disposed of on site. To record the source and composition would be unduly onerous and prescriptive. Provided that minerals operators, who are rehabilitating their site, meet the requirements of clause (a) of rule 13-19, there is no significant benefit derived from keeping records of where all deposited material comes from, as well as recording its composition. To be precise about composition would require sample laboratory testing of all deposited material. Such a process would clearly be very onerous and expensive for operators and would provide minimal benefits, far exceeding the costs incurred.
- 6.36 The AQA submits to amend clause (b) of rule 13-19 to allow for greater than 2,500m<sup>3</sup> for aggregate operators and delete clause (d) of rule 13-19 in its entirety.

***Further submissions on the Aggregate and Quarry Association of New Zealand (Inc) submissions***

- 6.37 No further submissions have been made on either of these submission points.

***Conclusion on submission***

- 6.38 The Officers report in regards to this submission point has not yet been provided.
- 6.39 Many existing resource consents require the rehabilitation of sites as a condition on the consent. By restricting the limit of cleanfill to 2,500m<sup>3</sup> per site per annum

the conditions relating to rehabilitation on existing resource consents may not be able to be achieved without having to acquire a further consent from the Regional Council.

6.40 I agree that the requirement under clause (b) of rule 13-9 would cause delay and may in fact prevent the rehabilitation of sites from occurring. In any event it will certainly result in additional and unnecessary costs being borne by members of the AQA without environmental benefit.

6.41 Under section 7(b) of the Act, the Regional Policy Statement needs to consider the efficient use and development of this resource and I believe clauses (b) and (d) of rule 13-9 do not achieve this and as such the submitted relief by the AQA should be adopted.

#### ***AGGREGATE AND QUARRY ASSOCIATION SUBMISSION 230/9***

6.42 It is further submitted to provide such consequential or other relief required to give effect to all of the stated submission points.

#### ***Further submissions on the Aggregate and Quarry Association of New Zealand (Inc) submissions***

6.43 No further submissions have been made on this submission.

#### ***Conclusion on submission***

6.44 The Officers recommendation in regards to this submission point is to accept this submission in part. It is not known at this stage what relief will be proposed by officers in relation to several submission points discussed above.

6.45 If the Council were to propose differing relief options to the submission points raised but still achieve the objective of each submission point this would be favourable.

### **7.0 CONCLUSION**

7.1 In conclusion the Hearing Panel will recall that in Part One of my evidence I provided an overview of the planning basis that underpins the AQA's submission. This included the consideration of Part II of the Resource Management Act and the key role and purpose of Regional Policy Statements.

- 7.2 In Part Two of my evidence, I discussed all of the AQA submissions that are currently being considered by the Council. I consider that all of these submission points are consistent with the context described in part one of my evidence and with the purpose of the RMA.
- 7.3 Aggregate and minerals are an essential resource of local and regional importance. As such they need to be adequately addressed in the One Plan. Council should adopt the submission points raised to meet the requirements of Part 11 and Section 59 of the RMA. Therefore I gratefully request that my submission points are accepted.



Amber Kathleen Brown  
Planner  
Harrison Grierson Consultants Limited

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