

1 March 2024

Mackenzie District Council
PO Box 52
Main Street
Fairlie 7949

By email: districtplan@mackenzie.govt.nz

Further submission on Proposed Plan Change 23 to the Mackenzie District Plan

- 1 We act for Road Metals Company Limited. Please find **enclosed** our further submissions on Proposed Plan Change 23 to the Mackenzie District Plan.
- 2 We confirm that this further submission has been filed on all parties referred to in this document.
- 3 If you have any questions, please contact me.

Yours sincerely



Jamie Robinson
Senior Associate

d +64 3 372 6459
m +64 21 376 459
jamie.robinson@duncancotterill.com

Table 1: Decision sought on Plan Change 23

Submitter name	Submission Number	Chapter/provision	Support or oppose	Particular parts Road Metals supports or opposes	Reasons for Road Metals position	Road Metals seeks that the whole or part of the submission be accepted or rejected
New Zealand Pork	PC23.26	GRUZ – Introduction	Support	<p>NZ Pork seeks an amendment to the introduction to the GRUZ chapter, to recognise the potential effects that can arise from activities rightly located within the rural zone. In particular, it identifies that noise, dust and odour should be anticipated and tolerated within a general rural environment.</p>	<p>Road Metals considers the changes proposed by NZ Pork more accurately reflect the purpose of the General Rural Zone, and the type of activities it should support.</p>	<p>The submission should be accepted.</p>
Fire and Emergency New Zealand	PC23.04	NATC-R4 & MAC-S2	Oppose	<p>Fire and Emergency seek provision for firefighting water supply to be included within the rule where no connection to a reticulated supply network exists. This is included as the submitter considers that quarrying and mining activities “can present a fire hazard”. The suggested performance standard would require non-reticulated water supply to be provided in accordance with SNZ PAS 4509:2008.</p>	<p>Firstly, Road Metals disagrees that aggregate extraction can present a fire hazard. With considerable experience in the industry, the directors of Road Metals are unaware of any fires caused by aggregate extraction. The nature of aggregate extraction is such that the topsoil is scraped away, and all work is done within gravel, which is often damp. The risk of fire is very low, as there is no material within the working area to catch alight.</p>	<p>The submission should be rejected.</p>

					The proposed addition to the permitted activity rule would render the rule nearly useless. The vast majority of these smaller sites relying on permitted activity status have no access to water (surface water or bores).	
Rooney Group Limited	PC23.49	GRUZ-R17 Quarrying Activities	Support	The Rooney Group submission seeks a sensible addition to the permitted activity rule, to authorise the ancillary stockpiling of gravel associated with extraction from the river bed.	The rules as proposed do not seem to address river based gravel extraction. It is appropriate to permit ancillary stockpiling from works within a riverbed on the 'landward' margin of the river.	The submission should be accepted .
Road Metals Company Limited	PC23.35 PC27.25	Mapping/zoning Subdivision and earthworks (new provision)	Support	<p>Support the proposal to rezone land to industrial, subject to the below addition as it relates to traffic effects:</p> <p>It is considered further certainty of transport integration outcomes could be optimized if some additional site-specific provisions are included, most suitably at the time of subdivision or creation of a new access or access road to the industrial zone.</p> <p>Matters of assessment should address:</p> <ul style="list-style-type: none"> • Opportunities to integrate the site access with any planned SH8 highway intersection upgrades, 	The proposed rezoning, with the revised traffic assessment matters as suggested, are the best and most efficient use of the site, and consistent with the Spatial Plan for Twizel.	The submission should be accepted subject to the changes suggested in this further submission.

				<p>including in the long term, and</p> <ul style="list-style-type: none">• The availability and suitability of active modes connections across SH8 taking into consideration the potential demand and traffic environment on SH8.		
--	--	--	--	---	--	--