

30 April 2024



Desmond Corrie-Johnstone  
CJ Industries Ltd

**RE: CJ Industries 134 Peach Island Road - Fast-track Approvals Bill Application – Eligibility matters**

Dear Des,

This memorandum relates to how the project will help achieve the purpose of the Bill, that is, to “provide a fast-track decision-making process that facilitates the delivery of infrastructure and development projects with significant regional or national benefits”. Specifically, this addresses the extent to which the proposal assists significantly in achieving outcomes sought by local/ regional planning documents – in this case the Tasman Regional Policy Statement (TRPS) and the Tasman Resource Management Plan (TRMP).

Issue 6.9 in the TRPS acknowledges that minerals:

*“are locationally fixed and non-renewable, and if they are to be extracted or protected, they must be extracted (and often processed) or protected where they occur. Minerals do not exist in isolation from other resources: they may underlie outstanding landscapes, significant ecosystems, or land of high productive value...”*

Relatedly, Objective 6.7 seeks the avoidance, remedying or mitigation of the adverse effect of land uses on the accessibility of mineral resources. The reasons supporting this objective state that:

*‘The use, development or protection of surface features of land may constrain access to mineral resources, although the constraint may be economic rather than physical obstruction or degradation of the mineral resource itself.’*


This provides useful context to the fact that the mineral resources of the type that this application relates to (river run aggregates) are locationally fixed within the region, generally within rural zones. Expert economic advice supporting the application confirms the local need for, and finite nature of, these mineral resources and the need for them to be sourced from where the resource exists and near to where they will be used (for reasons of cost and transport carbon emissions). If these resources are to be available for use in high value end products (concrete and sealing chip) then there is a functional need for these activities to be located within existing or former rivers, which are generally within rural zones. The TRPS recognises this, and the proposal is consistent with achieving the related provisions.

The effects of such activities need to be assessed on a case-by-case basis to determine whether this can be achieved whilst also achieving consistency with the other provisions of the TRPS and other statutory documents and this has been undertaken in this case. Specifically, the proposal achieves consistency with relevant sections of the TRMP (and the TRPS provisions that they give effect to) including those relating to site amenity effects (Chapter 5), rural environment effects (Chapter 7), the margins of rivers (Chapter 8), landscape (Chapter 9), significant natural values and historic heritage (Chapter 10), land transport effects (Chapter 11), land disturbance effects (Chapter 12), natural hazards (Chapter 13),

discharges to land and fresh water (Chapter 33) and discharges to air (Chapter 34). Effects of the proposed activities have been assessed by relevant experts and deemed to be appropriately managed by the proposal, such that consistency with the relevant TRMP provisions has been demonstrated.

As such, the proposal enables the efficient use of a valuable and finite mineral resource within the region, in a location that is able to benefit the delivery of infrastructure and building materials in the region in an economically viable manner (based on expert advice).

Sincerely,



Hayden Taylor  
Resource Management Consultant  
Planscapes (NZ) Ltd