

Submission

Aggregate and Quarry Association and Straterra To Waimakariri District Council Rural Residential Development Strategy

5 April, 2019

Introduction

This brief submission to the Waimakariri District Council on its proposed [Rural Residential Development Strategy \(Draft Strategy\)](#) is made jointly on behalf of the extractives sector by Aggregate and Quarry Association (AQA) and Straterra.

The AQA is the industry body representing Construction Material companies which produce an estimated 50 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

Straterra is the industry association representing the New Zealand minerals and mining sector. Its membership is comprised of mining companies, explorers, researchers, service providers, and support companies.

Waimakariri District Council is well regarded by the extractive sector operating close to best practice in the planning area. This is apparent in the Draft Strategy where some accommodation for quarries is made. However, there are some comments we would like to make which we hope will be helpful in developing the strategy further and in terms of district planning generally.

The extractive sector (mining and quarrying) makes an important contribution to the New Zealand economy as well as the Waimakariri District economy at a local level. Not only are there a number of existing quarries in the district but there is potential for future development of mineral resource.

Submission

Waimakariri District has an expanding population and to facilitate its continued growth the Waimakariri District Council has published a draft Rural Residential Development Strategy which identifies preferred locations for future residential development.

Our interest in the Strategy is to ensure the population growth is able to be accommodated by a ready supply of sand and aggregate necessary for the associated infrastructure development and also to ensure that access to a key natural resource of value to the district is not inadvertently shut off.

Identify Key Resource Areas

There are three considerations relating to the extractive sector the council should be mindful of when finalising its strategy. Firstly, mineral and aggregate deposits are limited in quantity, location and availability. They can only be sourced from where they are located and where the industry is able to access them. In the face of Waimakiriiri District's growing population it is essential that planning provides for the adequate access to aggregate and mineral resources.

We believe it is essential that the council takes steps to ascertain the location of all such mineral or aggregate resource areas within the district. This is not easy but there are a number of approaches that can be taken and we are happy to further discuss these with the council.

Not doing so could eventuate in non-compatible activities (such as, in this case, residential areas) being established over or too near deposits. Such sterilisation of existing and future resources has the potential to compromise the district's development and/or raise the cost of that development. It could mean lost opportunities for accessing a ready supply of sand and aggregates which are an essential input in developing the infrastructure necessary to enable the anticipated population growth. Closing down the ability to extract the resource also means lost opportunities for the local economy in extractive industry investment and jobs.

Reverse Sensitivity

Secondly, it is imperative that reverse sensitivity effects are avoided.

Due to the nature of extractive industry operations - including noise, vibration and dust - non-compatible land uses, such as residential areas, must not be allowed to encroach upon these operations or their surrounding areas. This is for the benefit and comfort of residents as much as it is to prevent disruption to extractive operations.

We are very pleased that the draft strategy encompasses this – specifically on page 10 where it states: “the location and design of any proposed rural residential development shall ... avoid significant reverse sensitivity effects with adjacent rural activities, including quarrying and agricultural research farms, or strategic infrastructure.”

This provision demonstrates that the council recognises the importance of quarries and is cognisant of the reverse sensitivity effects that can arise as a result of the proximity of dwellings to quarries.

While at present, there is no mining activity to speak of in Waimakariri, it would be unwise to shut down the potential for future activity by not making allowance for this in the strategy and in council planning generally. To allow for the possibility of future *mining* in the district, as well as quarrying, we suggest that the term mineral extraction be included in the aforementioned statement as well as quarrying and research farms etc.

Distance from Quarries

Thirdly, in determining a reasonable distance for residential areas from potential quarry areas, as well as the risk of reverse sensitivity, the significant expense of transporting quarry materials also needs to be taken account of.

As the district grows, sand and aggregates will be a significant input in the required infrastructure investment associated with the growing residential base. Roads and construction activity generally require substantial amounts of aggregate. For example, a 2.4 tonne, cubic metre of concrete contains 2.0 tonnes of sand and aggregate and an average of around nine tonnes of stone, gravel and sand per New Zealander is consumed each year.

The cost of a tonne of aggregate doubles when it has to travel 30 kilometres from a quarry, with additional costs for each extra kilometre thereafter. One of the factors that should determine where residential expansion is allowed to occur should be the optimal distance from potential quarry areas so that transport costs and associated transport emissions and congested are minimised.

Conclusion

Finally, we would like to draw your attention to the [RMA Quality Planning Resource on aggregates and quarries](#) which has been produced by the Ministry for the Environment and Local Government New Zealand at the initiation of the AQA. We commend this document to all planners as a way of promoting best practice to deal with the range and scale of resource management issues associated with the aggregate and quarrying sector.

In conclusion we acknowledge the positive steps taken by Waimakariri District Council to accommodate quarries in its residential strategy and ask it to continue to do so in its district planning generally by considering the points in this submission relating to the limited quantity, location and availability of mineral deposits. We also ask it to extend these principles to the extractive sector generally as well as quarrying specifically.