

Submission

Aggregate and Quarry Association and Straterra To Waitaki District Council

District Plan Review

5 August, 2019

Introduction

The Waitaki District Council is reviewing its District Plan and is seeking feedback on its Discussion Document, [Waitaki 2030, Shape Your Place](#).

This brief submission is made jointly on behalf of the extractives sector (mining and quarrying) by the Aggregate and Quarry Association (AQA) and Straterra.

The AQA is the industry body representing construction material companies which produce 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.

The extractive sector has an important role to play in Waitaki District. Most significantly, Oceana Gold's Macraes Mine is partially located in Waitaki. Oceana Gold employs hundreds of people at Macraes, spends 78% of its revenue within New Zealand and we expect that mine to be operating for many years to come.

There are also a number of quarries operating in the District. Not only are the products produced by this sector essential inputs for growth and infrastructure development, quarries in Waitaki directly and indirectly employ many people and contribute significantly to the local economy.

In addition to the existing operations, it is important that future opportunities are accommodated. Current and future growth will require access to a supply of sand and aggregate necessary for the associated infrastructure development. There is also potential for other mineral development in Waitaki and so it will be important to ensure

that access to a key natural resource of value to the district is not inadvertently shut off. It should be noted that exploring and, if successful, developing natural resources carries no direct cost, or risk, to the Council – such provision would not replace the RMA in any way.

Submission

There are three considerations relating to the extractive sector the council needs to be mindful of when reviewing its plan.

1. Mineral and aggregate deposits are limited in quantity, location and availability and suitable resource areas need to be identified.
2. Reverse sensitivity effects from the extractives sector can be significant and must be avoided.
3. The substantial cost of transporting hefty quarry materials needs to be taken account of in district planning.

1. Identify Key Resource Areas

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.

Existing and future mining and aggregate extraction land and activities need to be adequately recognised, provided for and protected.

We believe it is essential that the council takes steps to ascertain the location of any such mineral or aggregate resource areas within the district. Just as the Discussion Document says high class soil areas should be protected, consideration needs to be made for the protection of land containing mineral resources where its location is known.

Not doing so could eventuate in new residential growth areas and related non-compatible activities being established over or too near such deposits. Such sterilisation of existing and future resources has the potential to hold back the district's development. It could mean lost opportunities for accessing a supply of sand and aggregates which are an important input in developing the infrastructure so necessary to enable economic development of the district. Closing down the ability to extract the resource also means lost opportunities for the local economy in extractive industry investment and jobs.

2. Reverse Sensitivity

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 would like to see explicit recognition of the importance of quarries and acknowledgement of the reverse sensitivity effects that can arise as a result of the proximity of dwellings to quarries.

3. Distance from Quarries

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 hefty quarry materials needs to be taken account of.

A cubic metre of concrete contains two tonnes of sand and each New Zealander consumes an average of around nine tonnes of stone, gravel and sand 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 travelled thereafter.

This means that one of the factors that should determine where residential expansion is allowed to occur should be the optimal distance from potential sources of quarried products so that transport costs and associated transport emissions and congestion are minimised. The document acknowledges that there is a poor linkage between where development is occurring and what infrastructure will be needed. The location of quarry resources needs to be considered in this light.

The Discussion Document

The Discussion Document is relatively high level and references to the extractive sector are limited to:

1. the creation of a Special Purpose Zone for the Oceana Gold mining area
2. a new Earthworks chapter which will also address general mining, quarrying and gravel extraction activities.

The document identifies some issues which need to be addressed and signals what the council's thinking is on these issues at this stage, but it does not go into any detail on issues relevant to our sector. There are a number of areas relevant to the extractive sector which we comment on in this submission but to really add value to the process, we would like to meet with the council and discuss in more detail what the responses to these issues could be.

Special Purpose Zone for Macraes Mine

We support the proposal to create a Special Purpose Zone in the new District Plan for the Oceana Gold mining area. The size and significance of the mining area warrants this.

We note that the mine crosses district boundaries, that is, it is also contained within the Dunedin City boundary. This means it will be important for the company that there are consistent rules across both council areas for it and we encourage the council to talk to the company to see how this can best be coordinated and achieved.

New Earthworks Chapter

The document notes (under the section on the new Earthworks chapter) that *“mining, quarrying and gravel extraction activities can often generate effects that are experienced beyond their site boundaries, such as noise, dust, vibration, damage to roads and traffic safety.”*

In response to this, the document proposes to *“strengthen the rule framework for mining, quarrying and gravel extraction to limit the number of truck movements, noise, dust, hours of operation and setbacks from sensitive activities such as residential. Also require site landscaping and site restoration measures.”*

We accept that the rule framework around these things need to be robust and that there is a need to avoid, remedy or mitigate to the extent practical, the adverse impacts of these things. However, we caution the council that the rules must be reasonable and not unnecessarily impinge upon the operations of the mine or quarry. We would like to talk to the council further about possible rules. In the meantime, we make these brief, high level comments as to what the rules for each of these could look like.

With regard to **noise and vibration** associated with quarrying activities, we accept there is a need to avoid, remedy or mitigate noise associated with quarrying activities and we support the setting of reasonable noise standards - either general standards or standards associated with particular types of quarrying activities. The quarrying sector has developed codes of practice that may help inform Council in this area including tools such as timing restrictions on operations, and rules around the use of noise barriers such as earth bunds or acoustic fences and equipment type and insulation.

One suggestion we would like to make at this early stage is to draw your attention to [NV 6.9 in the Table from Whangarei District Council’s District Plan](#), which is recognized as the industry standard.

Any conditions to limit **truck movements**, including timing constraints, must consider the operational requirements of the quarries and ensure aggregate supply is maintained.

The document alludes to a rules framework for **setbacks from sensitive activities such as residential**. Setbacks are a topical issue in other parts of New Zealand, particularly in areas around Christchurch where growing residential areas are expanding towards existing quarries with all the reverse sensitivity implications associated with it.

As noted above in the Reverse Sensitivity section, 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. The location or planned location of quarries must be allowed for when residential areas, and expansion, are being proposed.

There is a case for introducing resource consent requirements for such activities which are potentially impacted by quarries. This would be to avoid reverse sensitivity impacts in the case where new activities are established near existing or potential quarries. For example, acoustic insulation of new residential dwellings could be a resource consent requirement for proposed developments near quarries.

Dust and air quality impacts from quarries are recognized by quarry operators as an important issue although these impacts can be difficult to measure. Currently dust and air quality are managed at the regional not district council level, which we think is appropriate. There are many mitigation measures available to quarry operators on site to mitigate the effects of dust beyond the boundary of the site, for example water spraying of stockpiles and vegetation bunds. We support the continuation of sensible regulations around these issues, and as with the others would be pleased to give you a more detailed perspective on this at your convenience.

With regards to **site landscaping and site restoration measures**, minimum requirements for assessing proposed quarries such as the provision of environmental management plans and rehabilitation plans are supported. The sector applies this approach generally. Of course, what these minimum standards are and how they are set is key and we think it is essential that the sector is closely involved in the process of setting them.

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 Aggregates and Quarry Association. 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 would like to reiterate the need for the council to accommodate quarries and the extractive sector in its district planning generally and in doing so be mindful of the limited quantity, location and availability of mineral deposits.