

Submission

Aggregate and Quarry Association and Straterra To Whangarei District Council

Whangarei District Growth Strategy

June 2019

Introduction

This submission on the draft [Whangarei District Growth Strategy](#) (Draft Growth 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.

The extractives sector has an important role to play in Whangarei. It is important that Whangarei's current and future growth is able to be accommodated by a supply of sand and aggregate necessary for the infrastructure development associated with that growth. What is more there is potential for future discovery and development of mineral resources and it is important to ensure that access to natural resources of value to the district is not unintentionally shut off.

Not only are the products produced by the sector essential inputs for growth, quarries in Whangarei directly and indirectly employ many people and contribute significantly to the local economy.

At present, there is no significant mining activity in the district. Maintaining the ability to explore for and, if exploration is successful, develop natural resources carries no direct cost, or risk, to the Council – such provision would not replace the RMA in any way.

Background

Whangarei District has a growing population and to facilitate, and respond to, this growth the Whangarei District Council has published a draft Whangarei District Growth Strategy.

The Draft Growth Strategy provides a vision for how Whangarei District will grow and develop over the next 30 years and identifies future areas for development. It has been written in response to the National Policy Statement on Urban Development Capacity which identified Whangarei as a 'High Growth Area' and required Council to assess capacity needs for housing and business over the next 30 years and to prepare a plan outlining how that capacity will be provided for.

Submission

There are three considerations relating to the extractives sector the council needs to be mindful of when formulating its growth strategy.

1. Mineral and aggregate deposits are limited in quantity, location and availability and access to potential and suitable resource areas is essential if these resources are to be developed.
2. Reverse sensitivity effects from the extractives sector can be significant and must be avoided.
3. The location and cost of transporting 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. In the face of Whangarei District's growing population, it is essential that planning provides for access to aggregate and mineral resources. Land with known aggregate resources should be set aside and allowance to access it should be retained. The location of mineral deposits is not usually known, so a regime which provides for exploration is important, while noting that any development proposal that might arise from that exploration is subject to a rigorous resource consent process under the RMA.

While there is reference in the Draft Growth Strategy to maintaining and protecting productive land (pages 18 and 38) and industrial land (pages 65 and 96), there does not appear to be any reference to ensuring that existing and future mining and aggregate extraction land and activities are adequately recognised, provided for and protected.

We believe it is essential that the council takes steps to ascertain the nature and location of any such aggregate resource areas within the district.

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 constrain, to raise the cost of and to increase emissions resulting from 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 that is so 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.

This particularly applies in the context of new residential growth areas. As an example, the section on 'greenfield on the periphery' (page 44) should include an acknowledgement of the need to be cognisant of potential aggregate and mineral deposits when developing new residential areas.

We note that Policy 5.1.4 of the Northland Regional Policy Statement deals with regionally significant mineral resources and requires district plan maps to show these where they have been identified. We encourage council officers to refer to the Policy Statement and specifically these pages.

2. Reverse Sensitivity

We are pleased that the draft strategy acknowledges reverse sensitivity issues – for example on page 28 where it says “Incompatible land uses which will create reverse sensitivity issues (e.g. new residential development located close to established industry may lead to noise complaints which could impact on the operation of the industry)”.

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.

We note that the Northland Regional Policy Statement is clear about this where, in objective 3.6, it refers to activities and land that should be protected from the negative impacts of subdivision, use and development because of their importance to Northland's economy. Mining including aggregates and other minerals is specified here.

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 quarry materials needs to be taken account of.

A cubic metre of concrete contains two tonnes of sand and aggregate. An average of around nine tonnes of stone, gravel and sand per New Zealander is consumed each year. The cost of aggregate doubles when it has to travel 30 kilometres from a quarry, and costs increase as distance increases.

This means that 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 congestion 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 Whangarei District Council to plan for its growth and would like to remind it of the need 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.