Submission to Selwyn District Council
Quarrying - Selwyn District Plan Review

THE AGGREGATE & QUARRY ASSOCIATION OF NZ

8 October, 2018

Introduction

This submission to the Selwyn District Council on its review of the quarrying activities in the Selwyn District Plan is made by the Aggregate and Quarry Association (AQA). It addresses a number of issues raised in the preferred options report and factsheet.

The AQA is the industry body representing Construction Material companies which produce around 85% of the estimated 50 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

The extractive sector (mining and quarrying) makes an important contribution to the Selwyn District and New Zealand economies. Currently an average of around nine tonnes (one rigid truckload) of stone, gravel and sand per New Zealander is required each year to meet New Zealand's ongoing infrastructure demand. With our population set to rise to between 5.3 and 7.9 million by 2060, this rise in population alone will require approximately 1.2 million new homes to be built over the next 40 years. That is 30,000 new homes every year.

Key points relating to quarries

Growing districts such as Selwyn District need to secure supply of quarry materials to provide affordable housing and infrastructure now and for future generations. In order to secure supplies, it is critical that planning is accommodating. It is in councils' interests to identify these key resource areas within their districts and protect them.

Planners should be mindful that quarry materials are not universally available and can only be sourced from where they are located. This means it is in the interests of both the community and the quarries that potential quarry land be protected and surrounding areas be protected from encroachment of non-compatible land uses.

A particular challenge faced by the quarry sector and end-users is maintaining urban and urban-fringe quarries. Currently, 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. By ensuring quarries are close to their markets, transport costs (ultimately borne by consumers), transport congestion and carbon emissions are significantly reduced.

The constraints around where quarries can be located due to the location-specific nature of deposits and the need for them to be near their markets should be taken into account in council planning. Bad planning has the potential to sterilise existing and future resources which means lost opportunities for the local economy.

An important issue for quarries operating in areas of expanding residential growth is reverse sensitivity - people complaining about quarries after moving into an existing quarrying area. Due to the nature of quarry operations and its impacts - including noise, vibration and dust - it is important that non-compatible land uses such as residential areas are not allowed to encroach upon quarries. This is for the benefit and comfort of residents as well as the general public.

Quarries have a finite life, after which they are returned to the community as an improved community asset. A rehabilitated quarry can be a biodiversity or wet-land sink or a recreational or residential area. The point is, any negative environmental impacts from quarrying are relatively short term and the long term use of the site needs to be considered.

Quarries fully expect to have stringent environmental and resource requirements put in place for new or renewed consents, however quarries sometimes sit idle due to fluctuations in demand such as in post disaster situations. To ensure the continuity of supply of aggregate, planning rules need to allow for fluctuating demands and periods of quarry inactivity. This will create an enduring industry which can respond quickly and appropriately to changes in market conditions.

Comments on specific objectives and policies

Definition of Quarrying

The current definition is too narrow. It needs to include all component activities associated with quarrying including the processing of aggregates, as does the definition used by the Christchurch City Council for example, which states –

Quarrying activity

means the use of land, buildings and plant for the purpose of the extraction of natural sand, gravel, clay, silt and rock, the associated processing, storage, sale and transportation of those same materials and quarry site rehabilitation. It may include:
earthworks associated with the removal and storage of over-burden;
extraction of natural sand, gravel, clay, silt and rock materials by excavation or blasting;
processing of those extracted materials by screening, crushing, washing and/or mixing them together;
the addition of clay, lime, cement and recycled/recovered aggregate to extracted materials;
ancillary aggregates-processing activity;
workshops required for the repair of equipment used on the same property;
site management offices;
parking areas;
landscaping; and
quarry site rehabilitation and any associated clean-filling.'

Quarrying as a discretionary activity

We would support quarrying designated as a discretionary activity provided the Selwyn District Plan policy framework recognises the importance of quarrying and that the location of quarries is necessarily subject to the location of the resource. The environmental impacts must be managed but where quarries already exist and are being expanded, the policy must recognize that such effects are a component of rural character so as to avoid reverse sensitivity issues.

Setback Distances

As outlined above, there are a number of factors to be considered here to ensure the benefit and comfort of residents as well as the interests of the quarries and its customers. If the environmental effects of quarrying such as noise, dust and vibration etc. can be addressed by other parts of the District Plan, then it begs the question as to whether prescriptive setback distances are necessary.

Rather than prescribed distances, we recommend investigation into an approach that would align any setbacks with appropriate amenity related standards such as noise limits.

Minimum Information Requirements

We support Minimum Information Requirements for assessing quarry resource consent applications as they would help avoid uncertainty around information expectations for applications. However, these should be carefully compiled and not unduly prescriptive otherwise they could stifle innovation.

Environment Canterbury and Dust

We support the proposal to delegate the council's function of assessing the impacts of dust to Environment Canterbury. It is well equipped to address air quality matters and avoiding the duplication and potential conflict is important.

Other Issues - *Frequently Asked Questions*

We are concerned that in the Frequently Asked Questions section of your Quarrying Factsheet as part of the District Plan review, the first and second questions are unduly negative. The first question in relation to why the council doesn't ban quarrying in the district does not defend quarrying and use the opportunity to outline its importance rather than negatively state the reason as because it "would be illegal". The second question relating to a moratorium on current applications also foregoes an opportunity to paint a balanced picture about the importance of quarrying.