

Submission on the discussion document on Our future resource management system

March 2022

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing Construction Material companies which produce an estimated 45 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

Funded by its members, the AQA has a mandate to increase understanding of the need for aggregates to New Zealanders, improve our industry and users' technical knowledge of aggregates, and assist in developing a highly skilled workforce within a safe and sustainable work environment.

Background

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 increase 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.

Central and local government will need to invest an unprecedented amount of money into infrastructure, such as schools, hospitals, roads and transport, to meet this population growth. The New Zealand Government relies heavily on locally sourced aggregate resources for infrastructure repair following disasters, for road and rail transport corridors, major projects and for housing development, all of which are essential for the social, economic, and cultural wellbeing of communities.

The aggregates sector has an important role to play in helping mitigate and manage the effects of climate change through supply of aggregates for sea walls, river flood protection and building materials required following natural disasters.

New Zealand needs to secure supply of our quarry materials to provide affordable housing and infrastructure now and for future generations. In order to do this, it is critical that planning is streamlined, quarry resources are protected so they can supply vital construction materials and quarry land is returned as an asset to the community once extraction is complete.

General comments

Adequate provision must be made in planning documents to recognise existing and potential aggregate and sand deposits and provide for their extraction. Quarry materials are not universally available and can only be sourced from where they are located (locationally constrained). Without planning and a resource management system that provides for adequate access to resources at workable locations, there is the real risk of losing access to such proximate resources.

Construction materials are generally defined as everything used to build roads, bridges, houses and commercial structures, apart from timber and metals. They include aggregates, sand, limestone, cement, concrete, plasterboard, bricks, roof tiles and asphalt.

The historical failure to recognise the importance of, and provide for, construction materials at a national level, together with capacity and capability constraints within local government to understand the importance of these materials has resulted in sub optimal outcomes.

National direction has an important role in ensuring consistent implementation of the Resource Management System across jurisdictions. It is important however that such direction allows flexibility for regional variations in community expectations, environment, and development needs. Greater direction through the National Planning Framework (NPF) will increase clarity and certainty, and reduce compliance activity, including the number of hearings required.

We consider it imperative that local authorities are directed to protect key resource areas and enable their development in order to both protect existing quarries from encroachment of non-compatible land uses such as housing, reduce reverse sensitivity potential, and to enable the expansion of these resources and development of new greenfield resources.

We make the following submission in relation to the discussion document on [Our future resource management system](#).

National Planning Framework (NPF)

We support an outcomes-focused system, and through the NPF central government direction that sets priorities for the integrated management of the environment and development to address conflicts across competing outcomes. It is imperative that construction materials, particularly aggregates, be expressly included in topics that the National Planning Framework must consider.

What role does the NPF need to play to resolve conflicts that currently play out through consenting?

Accessing construction materials (such as aggregates) has the potential to generate conflict such as amenity-related concerns. Reconciliation of such conflicts is principally left to the consenting process at present. The NPF should provide national direction as to whether, and how, high-quality aggregate resources should be protected from being sterilised through other development. For housing and infrastructure supply ambitions to be realised, it is imperative that the supply of construction materials be expressly included in Clause 13 of the NBA.

It is important that the NPF is established with effective and proportionate public consultation that allows reasonable time and opportunity for input from all parties including the aggregate sector.

Regional Spatial Strategies (RSS)

To what degree should regional spatial strategies (RSSs) and implementation agreements drive resource management change and commit partners to deliver investment?

Regional Spatial Strategies will be critical in bringing stakeholders together to advance more detailed project planning for certain infrastructure or environmental remediation projects. Too often projects are planned and commenced without consideration of where essential materials are going to be sourced, resulting in significant impact on cost and timelines of delivery.

How can appropriate local issues be included in RSSs?

The scope of the RSSs needs to be expanded as follows:

- *Support development capacity and infrastructure provision, including by identifying indicative future infrastructure corridors, and **availability of locally sourced construction materials**, or areas to improve housing supply, affordability and choice.*

Without appropriate recognition of the importance of construction materials including aggregates, developing resources will continue to be difficult, time consuming and expensive and the resource management system will fail to deliver on its intended objectives.

Consenting

Will the proposed future system be more certain and efficient for plan users?

The outcomes-based approach proposed should be more certain and efficient while protecting resources (e.g. biodiversity), enabling activities (e.g. housing and infrastructure), and responding directly to the needs of communities.

Legislation should set clear and specific ways of regulating environmental issues based on outcomes and at the same time provide the tools to allow balanced decision making about where and how development can occur.

Quarries fully expect to have environmental and resource management requirements put in place for new or renewed consents. However, some quarries have very low impact on the environment, iwi or local communities and sometimes sit idle due to fluctuations in demand such as in post-natural disaster situations. To ensure the continuity of supply of aggregate, the resource management system needs 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.

Existing use rights

The NBA exposure draft and this discussion document do not provide any information on existing use rights; however, an outcomes-based approach may make it easier to extinguish existing use rights if these activities conflict with key specified outcomes in regional plans.

Commitments have already been made by government on a number of occasions that existing rights to continue production or exploration activities will be protected. This commitment was also captured by Principle 10 of the Minerals and Resource Strategy. It is essential that any changes to the resource management system do not affect those rights.

This must also include the rights of entities to variations or extensions to existing consented activities. That is, it needs to consider the natural extension of consented areas should aggregate deposits be expanded through quarrying works, and the ability to extend the duration of these existing resource consents.

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