

# Submission from the AQA on the Nelson Tasman Future Development Strategy

April 2022

## Introduction

The Aggregate and Quarry Association (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.

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.

We would like to thank the Tasman District and Nelson City Councils for the opportunity to comment on the [Draft Future Development Strategy](#) (the Strategy).

## Key Points

- Aggregate is an essential ingredient in climate change adaption; and the building of infrastructure, roading and housing and will be needed to achieve the growth and development of the region as anticipated in the Strategy.
- The risk of shortages due to sterilisation and the need to protect aggregate resources from future development is overlooked in the Strategy.
- We are concerned that the “core areas for new growth” outlined in the Strategy, happen to be areas of high aggregate potential meaning an important supply of future access to aggregate could be off limits if care is not taken.
- In order to future proof Nelson Tasman, land for existing and future aggregate extraction activities must be adequately identified and protected from encroachment of non-compatible land uses.
- The Strategy seems to be focused on protecting “highly productive” agricultural land for primary production but not highly productive quarrying land. We note that quarrying is part of the primary production definition in the Nation Planning Standards.

## The Importance of Aggregates and Council Planning

Aggregate (crushed rock, gravel and sand) is an essential resource for the construction of housing, roading projects and other transport infrastructure. It is used for general construction - in concrete, asphalt, mortar and other building products.

Aggregate is also important for increasing resilience and adapting to extreme weather events and climate change.

Due to the unprecedented levels of construction and infrastructure development activity, aggregate is increasingly in short supply in many parts of New Zealand including Nelson Tasman.

Not only is there high demand, supply is constrained. Aggregate deposits are 'location specific' - limited in quantity, location and availability. They can only be sourced from where they are physically located and where the industry is able to access them.

This means it is important that the location of aggregate resources are identified by councils and access is not inadvertently shut off through land development and council planning.

## The Nelson Tasman Future Development Strategy

The Nelson Tasman Future Development Strategy aims to influence where and how growth occurs in the region over the next 30 years.

We are concerned that insufficient attention has been given in the Strategy to aggregates in achieving the growth and to ensuring that land for existing and future aggregate extraction activities is available, adequately identified and protected from encroachment of non-compatible land uses.

Nelson Tasman's growing economy and population means there is increasing pressure on appropriate land for quarrying as expanding rural residential areas and competing industrial land uses put areas of aggregate supply at risk.

### Highly Productive Land

The Strategy makes many references to highly productive land but seems to be referring to agriculture land in this context. For example, in many places it states highly productive land is prioritised for primary production. We note that quarrying is part of the primary production definition in the Nation Planning Standards.

Just as the document emphasises that productive farmland should be protected it needs to do the same for productive land incorporating aggregate and other mineral resources. And where it is referring to agriculture it could instead perhaps use the term highly productive soils rather than highly productive land.

### Aggregate Shortfall

We are particularly concerned that the "core areas for new growth" outlined in the Strategy, both industrial and residential, happen to be areas of high aggregate potential and so development could sterilise future access to aggregate if care is not taken.

This is shown by the map provided by GNS Science attached in Appendix 1 which outlines the areas of aggregate potential for the Top of the South. It is notable that there is clear overlap in the areas of high hard rock opportunity and the core areas for new growth, as outlined in the map on page 27 of the Strategy and reproduced as Appendix 2.

This is a high-level representation, and we recommend that the councils work with the industry to identify aggregate potential at a more granular level.

Not only are the expected areas of population growth at risk of sterilising the aggregate, the aggregate is actually what is needed to achieve the growth. So it is a circular argument.

Aggregate production in the Nelson Tasman region has been at around 1 million tonnes a year in recent years (in 2020 it dropped to 640,000 due to Covid factors). The region is a higher (per person) user of aggregates than other parts of the country because of its population growth, extensive roading network and lengthy coastal area but the anticipated growth, as reflected in the strategy, suggests this will need to increase.

Looking at housing alone, the anticipated 29,000 new homes needed in the next 30 years amounts to 7.2 million tonnes of aggregate, based on industry averages<sup>1</sup>, or 240,000 additional tonnes being required annually.

The extra 7.2 million tonnes shows the extent of the shortfall. Aggregate will either need to be produced locally or imported at a much higher cost to fill this gap.

## **Climate Change**

The Strategy rightly highlights that Nelson Tasman is subject to a range of natural hazards and the effects of climate change.

It is important to note the role of aggregates in strengthening resilience to natural hazards and climate change. Aggregates, for example, are needed for flood protection and to adapt to sea level rise and coastal erosion through strengthening of sea walls etc. They will be needed to repair damage to coastal infrastructure and to make infrastructure generally more resilient to greater intensity storms and extreme weather events.

In terms of climate change mitigation and the reduction of emissions, aggregate plays a role in, for example, the construction of wind farms. New wind capacity for New Zealand, expected by the Climate Change Commission in the next 15 years, will require an additional 1 million tonnes of aggregate and sand.

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<sup>1</sup> The building of an average house requires about 250 tonnes of aggregate.

## Other Issues

Determining an optimal distance for residential areas from potential quarry areas, is important. Too far away means significant expense of transporting quarry materials as well as congestion and CO<sub>2</sub> emissions. (The cost of aggregate doubles when transported 30 kilometres from its source.) Too close brings reverse sensitivity issues due to the nature of extractive industry operations including noise, vibration and dust. Development areas should ideally be as close as reasonable to identified areas of aggregate.

Note that quarries have a finite life. Once the rock is extracted the land is returned to the community and can be used in a variety of ways. It is not inconceivable that housing and other developments can occur on and around former quarry land that has had the rock extracted.

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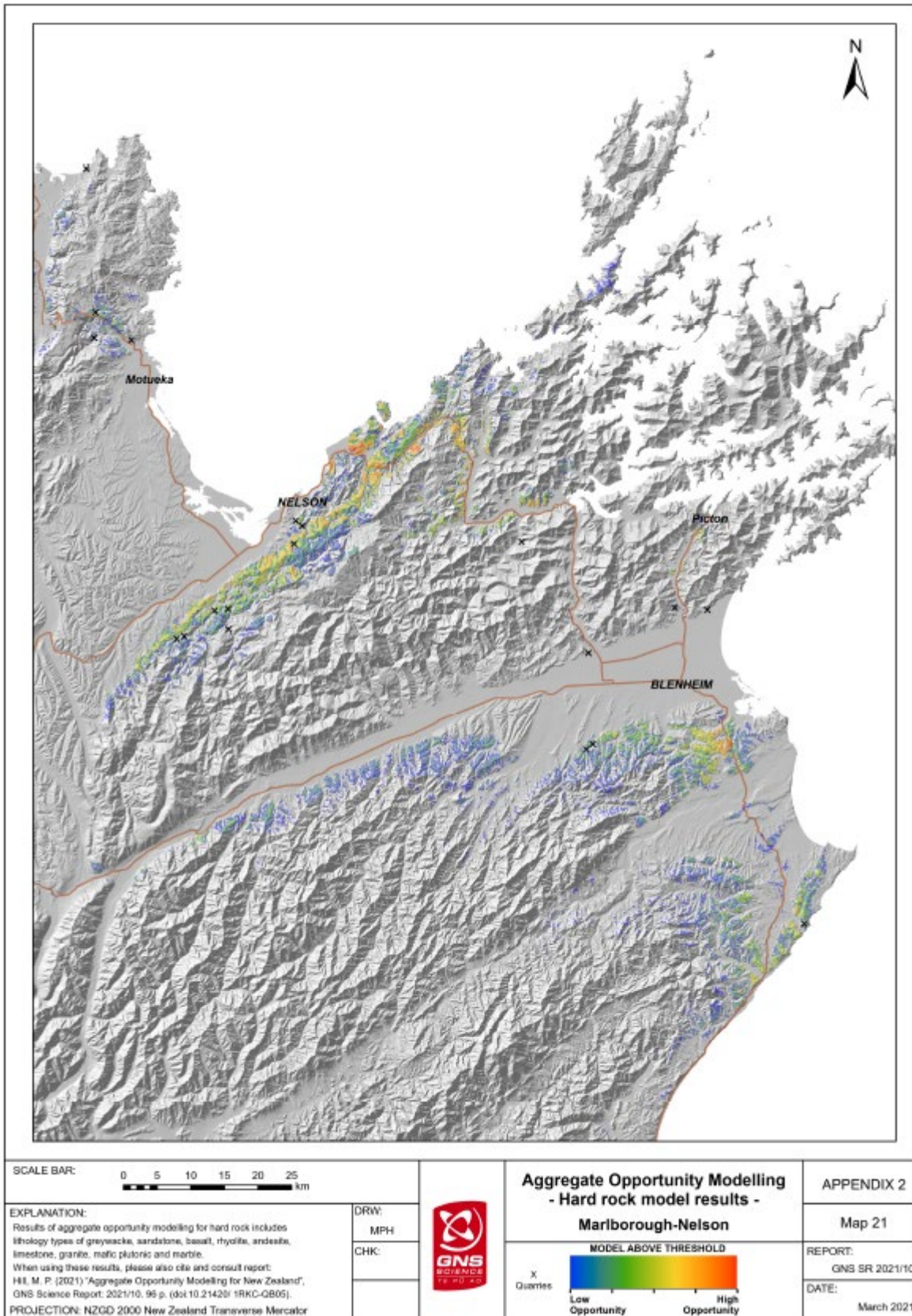
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## Appendix 1 – Aggregate Potential, Top of the South



## Appendix 2 - Future Development Strategy “The Proposal”

