

Submission from the AQA on the Tasman Environment Plan

December 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 Council for the opportunity to comment on the Tasman Environment Plan and specifically the document, [Managing Tasman's Environment and Development](#).

Key Points

The document gives insufficient attention to the contribution of quarrying to Tasman District and its role and impact on Tasman's environment and development. The quarry sector is particularly relevant to the sections on Transport, Energy and Infrastructure and Rural Areas.

Council planning must identify where potential aggregate resources are located and protect those areas from other development and alternative land uses.

The draft concept rules in the Outstanding Natural Features and Landscapes sections are restrictive for quarrying. The negative impacts of quarrying on these areas are able to be addressed through the effects management hierarchy/consenting process.

The Importance of Aggregates and Council Planning

Aggregate (crushed rock, gravel and sand) is an essential resource for the construction sector, for housing and transport infrastructure and for climate change adaption.

Due to unprecedented levels of construction and infrastructure development activity, there is growing demand for aggregate which is in short supply in many parts of New Zealand including the Tasman District.

Aggregate is a locationally constrained resource. Quarrying can only occur where suitable aggregate resource exists.

It is therefore important that Tasman District does not shut off access to potential aggregate resources. Council planning must identify where the rock is located and protect those areas from other development and alternative land uses.

The Tasman Environment Plan

In this section of the submission we go through the chapters of the document and comment on issues relevant to aggregate and the quarrying sector.

As a general comment, we are concerned that the document gives insufficient attention to the contribution of quarrying to Tasman District and its role and impact on Tasman's environment and development.

Quarrying is mentioned in the sections on Outstanding Natural Features and Landscapes and Coastal Environment and Coastal Natural Character but this is in a largely negative sense (see section below).

The document discusses Transport, Energy and Infrastructure and Rural Areas, all of which are relevant to the quarry sector. Quarries provide construction materials that are essential for housing, roads and other infrastructure (and in that regard, it is interesting there is not a separate chapter on housing).

Transport

There is no mention in the Transport section on aggregates or quarrying. Aggregate is an essential resource for the building of roading projects and other transport infrastructure. Different grades of aggregate and sand are used for the road's base layer, the pavement and the seal on top. To build 1km of a two-lane motorway, you need around 14,000 tonnes of construction aggregates (400 truckloads).

Energy and Infrastructure

The document correctly states "Infrastructure needs to be resilient to natural hazards and climate change effects". It should be noted that aggregates are needed to make infrastructure more resilient to resist extreme weather events. They will be required to build the structures that will protect against the effects of stronger storms, sea level rise and increased flooding on infrastructure.

New and strengthened sea walls and other such protections made from rock and/or steel-reinforced concrete will be required. Sea walls stabilise coastal roads and rail corridors and provide enhanced community facilities.

Rural Areas

Quarries are an important part of rural areas, and we are surprised there is not more discussion of them in this section of the document.

The focus of the discussion is on the desire for rural areas to look and feel rural. We agree this is important, but it seems to overlook the contribution rural industries (quarries, farms and orchards etc) make to the economy.

Quarrying's role as an important rural industry is reflected in various resource management instruments. For example, quarrying is included within the definition of primary production as defined by the National Planning Standards.

The NPS Highly Productive Land, designed to protect productive soil from urban sprawl, also protects land incorporating aggregate from inappropriate use and development. This is not surprising given land containing aggregates generates many times more revenue per hectare than dairy, beef/lamb or horticulture.

For these reasons when considering rural areas and rural industry, quarries need to be part of the picture.

What is said in the section about quarries gives us some concern: "quarries have generic planning rules that are not responsive to their individual settings" and the new plan should include "an improved set of policies and rules for managing the effects of quarries".

Outstanding Natural Features and Landscapes

We are concerned that the landowner and public feedback is very negative towards quarrying. This is summarised in the table below for ease of reference.

Specifically, the feedback identifies "large-scale earthworks, including infilling, reclamation, quarrying and mining" as a threat and as inappropriate (page 13-14).

There is also a view that there should be a distinction between 'existing large-scale quarrying' and 'all other quarrying and mining'; and that existing large-scale quarrying is appropriate to continue operating but all other quarrying and mining is not (page 14).

This largely uninformed feedback is a concern and we believe the Council has a role informing the public about the importance of quarrying and its role in the district's development.

Through the effects management hierarchy/consenting process the negative impacts of quarrying are able to be addressed.

We fully agree that quarrying in outstanding Natural Features and Landscapes should require a resource consent, but each case should be considered on its merits. New quarrying should not be ruled out especially given the likely demand for new sources of aggregate as the district continues to grow.

Detailed mapping of the Outstanding Natural Features and Landscapes and Coastal Environment overlays is not covered in this document. It will be important that the final mapping is done transparently with clear criteria and that the areas covered are not unreasonably extensive.

Coastal Environment and Coastal Natural Character

As with the Outstanding Natural Features and Landscapes section, we are concerned that the draft concept rules (page 16), taken at face value, are too restrictive for quarrying.

We agree that quarrying in many parts of the coastal environment and coastal natural character areas should require a resource consent, but each case should be considered on its merits and it's wrong to categorise it all as inappropriate.

Urban Areas

As the document says, Tasman is experiencing high levels of urban growth and demand for land for housing and business (page 18). Aggregate, which is already in short supply will be essential for this growth.

It is therefore important that Tasman District does not shut off access to potential aggregate resources. Council planning must identify where the rock is located and protect those areas from other development and alternative land uses.

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.

Quarries also need to be close to urban areas because of the significant expense of transporting bulky quarry materials. 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.

In determining a reasonable distance for residential areas from potential quarry areas, both the risk of reverse sensitivity and these transport costs need to be balanced.

Wayne Scott

Chief Executive Officer

[Aggregate and Quarry Association](#)

wayne@aqa.org.nz

021 944 336

Appendix 1 - Summary of public feedback and draft concept rules for 'Earthworks, Quarrying and Mining'

| | Outstanding Natural Landscapes draft concept rules | Outstanding Natural Features draft concept rules | Coastal environment and coastal natural character draft concept rules |
|---|---|--|---|
| Threat identified in the Landscape Study: | Large-scale earthworks, including infilling, reclamation, quarrying and mining. | Large-scale earthworks, including infilling, reclamation, quarrying and mining. | |
| Landowner and public feedback to date: | Mining/quarrying and large-scale earthworks is inappropriate. | These activities will have the greatest potential for impact on ONF areas that are geologically based e.g. cave systems. | Mining/ quarrying and large-scale earthworks is inappropriate. |
| Activities that are appropriate and are unlikely to adversely affect identified values: | Provision for existing large-scale quarrying to continue operating. | Maintenance and repair of existing tracks/roads, and fencing, subject to standards. | <ul style="list-style-type: none"> • Maintenance and repair of existing tracks/roads, fencing. • New roads/tracks limited in scale. • Underlying zone rules for general earthworks will be typically appropriate. |
| Activities that may not be appropriate, may have adverse effects on identified values and will require resource consent: | All other quarrying and mining. | Earthworks, quarrying and mining. Also, any earthworks in places of significance to Māori. | <ul style="list-style-type: none"> • Earthworks in places of significance to Māori. • Earthworks in an area identified as having outstanding natural character. • Earthworks within 100m of MHWS5 • Earthworks on ridgelines. • All mining and quarrying |

Appendix 2 – Aggregate Potential, Top of the South

