

Submission from the AQA on the Draft Whangārei Future Development Strategy

September 2024

Introduction

1. The Aggregate and Quarry Association (AQA) is the industry body representing quarrying companies which produce 45 million tonnes of aggregate and quarried materials consumed in New Zealand each year.
2. We would like to thank the Whangārei District Council for the opportunity to comment on the [draft Whangārei Future Development Strategy](#).
3. The Whangārei Future Development Strategy provides a roadmap for planning, managing and optimising the opportunities presented by future growth over the next 30 years.
4. It is an important initiative that provides a framework to manage growth and development in the Whangārei area. The Aggregate and Quarry Association is interested in the strategy because of the need to protect aggregate and other quarry materials from future development.

Key points

5. There is no reference in the strategy of the role of quarrying in the future development of Whangārei.
6. Aggregate deposits can only be sourced from where they are physically located and land containing them should be protected and quarrying enabled.
7. Provision needs to be made to identify and protect existing and potential aggregate and sand deposits and provide for their extraction.
8. The Council must avoid sterilising land containing aggregates with housing and other developments. Doing so will necessitate making provisions to access aggregates from further away which will lead to higher costs for ratepayers and users of quarried materials, increased traffic congestion and increased carbon emissions.
9. Likewise, the protection of highly productive land for food production can sterilise aggregate deposits. Land containing aggregates is also highly productive and we recommend that the Future Development Strategy revisit the policies around highly productive land after planned changes to the National Policy Statement for Highly Productive Land (NPS-HPL) have been announced by the Government.

Aggregates and Whangārei

10. 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.
11. It is also important for increasing resilience and adapting to extreme weather events and climate change.
12. Due to unprecedented levels of construction and infrastructure development activity in recent years, and with the ongoing housing shortage and infrastructure deficit needing to be addressed, there is elevated demand for aggregate across all of New Zealand.
13. Whangārei, in particular, is a fast-growing district where aggregate is needed to support infrastructure and other construction activity – including in the surrounding areas.
14. As noted on page 22 of the draft strategy, Whangārei's population is projected to climb from 103,473 in 2024 to 141,973 in 2053; an increase of 39%. This means on average an additional 1,283 houses per year will be needed over the next 30 years. This equates to approximately 360,000 additional tonnes of aggregate and sand per year¹ on top of what is needed for relevant infrastructure to support the increase in housing.
15. Many of the Regionally Significant Infrastructure Assets discussed/listed on pages 62 and 63 of the FDS will also put significant demand on existing quarry resources over the coming years – particularly the planned relocation of Whangārei District airport.
16. We are disappointed there is no mention in the document of the role and contribution of aggregate and quarrying in the growth of the district.

Protect access to potential aggregate resources

17. Whilst thinking about the future of the district it is important to be aware that aggregate deposits are 'location specific'. They can only be sourced from where they are physically located and where the industry is able to access them.
18. It is therefore important that Whangārei 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.
19. The AQA would be happy to talk to the Council about what is known about where potential aggregate resources lie and the work being done at a national level on this. Attached, in the appendix, is a map of the area produced by GNS Science showing known aggregate opportunity.

¹ Based on the rule of thumb of 280 tonnes of sand and aggregate per house.

20. Identifying and protecting this resource will be a major factor in future-proofing the district. Adequate provision needs to be made to recognise existing and potential aggregate and sand deposits and provide for their extraction. Without planning that provides for adequate access to resources at workable locations, there is a significant risk of losing access to such proximate resources.
21. Due to its weight and volume, aggregate is very expensive to transport. An additional 30kms of travel typically doubles the cost of aggregate. This highlights that shifting large volumes from outside the region or far from where it is to be used is very expensive and would increase the cost of many of the proposed projects.

Rehabilitation

22. Quarries have a finite lifespan – they are not there permanently. Once the aggregate has been extracted the land is able to be returned to its original use or used in a variety of other ways. Often the land is turned into community facilities.
23. Whangārei Quarry Gardens is an excellent local example of this. It is not inconceivable that housing and other developments can occur on and around former quarry land that has had the aggregate extracted, as has occurred in other parts of the country.

Highly Productive Land

24. The draft FDS argues for the protection of highly productive soils for future food and crop production.
25. It needs to be noted that land containing quarry materials is also highly productive. In fact, it is significantly more productive than soils used for agriculture and horticulture due to the value and scarcity of the aggregates produced relative to the value of agricultural commodities.
26. Like highly productive soils, aggregate deposits can only be sourced from where they are physically located and where the industry is able to economically access them. It will be important that potential quarry land is not sterilised by the National Policy Statement for Highly Productive Land (NPS-HPL).
27. We note that the coalition Government approach to highly productive land, i.e. the NPS-HPL is highly uncertain, and we recommend the FDS revisit this after planned changes to the NPS-HPL have been announced.

Increasing resilience

28. The FDS acknowledges the importance of building long-term resilience to severe weather events, coastal erosion and sea level rise. Aggregates will play a major role in this and in increasing Whangārei's resilience to climate change generally.
29. As pointed out in the document, the Whangārei city centre is prone to coastal and river flooding, and sea level rise. Other centres including Marsden Point and Ruakākā also face similar challenges.

Conclusion

30. To future proof Whangārei and minimise the risk of future shortages of quarry materials, the strategy needs to protect aggregate resources from future development. Failure to do so will mean it will have to be sourced, at considerable cost from outside the area, if available, at considerable cost.

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Appendix – Map of aggregate type classes

