Submission
Aggregate and Quarry Association and Straterra
To Waikato District Council
Proposed District Plan

9 October, 2018

Introduction

This submission to the Waikato District Council on its proposed District Plan is made jointly on behalf of the Aggregate and Quarry Association (AQA) and Straterra.

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.

Straterra is the industry association representing the New Zealand minerals and mining sector. Its membership is comprised of mining companies (including coal), explorers, researchers, service providers, and support companies.

The extractive sector (mining and quarrying) makes an important contribution to the New Zealand economy.

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.

Coal sourced from the Waikato region underpins steelmaking at Glenbrook and provides reliable energy to the Genesis Power Station.

Features of the extractive sector

As a general comment, the extractives sector presents the following characteristics for consideration when developing provisions in RMA plans:

- Extractive industries, especially mining, earn very high wealth off a small footprint and is almost always the highest value use of the land.
- Extractive industries employ people in skilled jobs; and contribute to the district's economic growth;
- Extractive industries produce materials that the local community, the country, and the world needs;
- Economic mineral, aggregate and sand deposits exist in very few places, and then they have to be found – minerals are location-specific;
- Extractive industries are a temporary use of land. During and after mining and quarrying, disturbed land is rehabilitated, and after closure, the site is returned into a former use, or a new or enhanced use, subject to resource consent conditions;
- Environmental management within the extractives sector increasingly follows international and New Zealand best practice.

Comments on specific objectives and policies

Waikato District Council Proposal	Recomm-endation	Reasons
1.4.2.3 Challenges 1. Economic development challenges facing the district are as follows: 5. The ability for the region to manage … environmental impacts of extraction across land-based industries may constrain further growth.	Support	Note that the environmental impacts of extraction can be managed and so the negative impacts on growth from this are minimal. What is more the positive impacts on growth from the extractives sector are significant as set out below.
1.4.2.3 Challenges 1. Economic development challenges facing the district are as follows:		Note that extractive industries are a higher value use of land than farming, that it is a temporary use of land and that it earns high wealth off a relatively small footprint.

8. A decline in the mining sector, with coal resources in particular becoming increasingly difficult and expensive to access, as well as public concerns about the environmental impacts of coal and mineral mining in the region, are a concern, considering its share of the district's GDP.		With respect to coal mining while reserves in existing license/permit areas are being depleted there are still significant coal resources in the Waikato region and the Waikato district and provision should be made to access those resources without the imposition of undue costs.
1.4.3.1 Rural activities Productive rural activities are those activities that use rural resources for economic gain or which cannot be carried out easily or appropriately in an urban setting. Farming activities, including dairy, dry stock, horse breeding/training, honey production, horticulture, pig and poultry, mining, and forestry are all significant industries in economic terms for the Waikato district.	Support	We are pleased to see the inclusion of mining in this list and recommend that quarries be included. It should be noted that where extractive activities are carried out is dictated / constrained by where the mineral deposits are located.
1.5.7.7 Energy 1. The district plan recognises the national and regional importance of existing energy resources and infrastructure, which include coalfields, coal mines, Huntly Power Station, gas, electricity transmission, and coal conveyance facilities, as well as renewable energy. The plan addresses the positive and adverse effects of energy infrastructure and development.	Support	The importance of energy infrastructure including coal mines and coalfields is noted and welcome.
4.7.11 Policy – Reverse sensitivity (b)Avoid potential reverse sensitivity effects of locating new dwellings in the vicinity of an intensive farming, extraction industry or industrial activity.	Support	Due to the nature of the extractive sector and its impacts - including noise, vibration and dust, it is for the benefit and comfort of residents as well as the general public, not to allow new dwellings in the vicinity of extraction activity. The same should also apply to areas set aside where new mines and quarries may be located.
5.3.7 Policy - Reverse sensitivity effects (a)Recognise the following features are typical of the rural environment and the effects are accepted and able to be managed: (ii)Noise, odour, dust, traffic and visual effects associated with the use of land for farming, horticulture, forestry, farm quarries; (iii)Existing mineral extraction and processing activities;	Support	We support this inclusion and note its relevance to 4.7.11 above

5.3.7 Policy - Reverse sensitivity effects (b)Avoid adverse effects outside the site and where those effects cannot be avoided, they are to be mitigated.	Support	
5.3.7 Policy - Reverse sensitivity effects (c)Mitigate the adverse effects of reverse sensitivity through the use of setbacks and the design of subdivisions and development.	Support	
5.3.13 Policy - Waste management activities (a)Provide for the rehabilitation of existing quarry sites, including landfill and cleanfill activities, where there is an environmental gain.	Support with amendment	Note The rehabilitation of quarry sites brings huge benefits for the community in the form of biodiversity or wet land sinks or a recreational or residential areas. The same applies to mining sites and this needs to be recognized by the plan.
5.3.15 Policy – Noise and vibration (a)Adverse effects of noise and vibration are minimised by: (i)Ensuring that the maximum sound levels are compatible with the surrounding environment;		Support but note this emphasises the importance of dealing with reverse sensitivity impacts so that the area surrounding extractive sites is able to accommodate sounds and vibrations necessarily associated with the sector and that there are not incompatible land uses within the surrounding areas
5.3.15 Policy – Noise and vibration (a)Adverse effects of noise and vibration are minimised by: (vii)Ensuring the adverse effects of vibration are managed by limiting the timing and duration of blasting activities and maintaining sufficient setback distances between aggregate extraction activities and dwellings or identified building platforms on another site.		
5.3.17 Policy – Specific area - Huntly Power Station – Coal and ash water (b)Provide for specific facilities that include the handling and haulage of coal and the disposal of coal	Support	

ash water within identified areas in close proximity to Huntly Power Station.		
5.4.1 Objective – Minerals and extractive industries 1. Mineral resource use provides economic, social and environmental benefits to the district.	Support	The minerals and extractive sectors contribute $2453 million in GDP and directly employ 6,050 people jobs, across New Zealand. Waikato District has one of the larger extractive sectors in the country. In addition to this the sector's outputs (coal, rock, sand, and gravel etc.) are crucial to the growth of the district within the infrastructure and energy sectors.
5.4.2 Policy – Access to minerals and extractive industries (a)Enable extractive industries provided that adverse effects are avoided, remedied or mitigated.	Support	
5.4.2 Policy – Access to minerals and extractive industries (b)Protect access to, and extraction of, mineral resources by: (i)Identifying lawfully established extractive industries in Aggregate Extraction Areas and Coal Mining Areas on planning maps; (ii)Identifying the site of a potential extractive industry within an Aggregate Resource Area on planning maps;	Support	We strongly support the identification of potential extractive industries sites To secure future supplies of minerals (including but not limited to coal, rock, sand, and gravel) it is in the community's interests to have identified these key resource areas and protect them.
5.4.2 Policy – Access to minerals and extractive industries (c) Ensure that lawfully established extractive industries are not compromised by new subdivision, use or development;	Support	Support for the same reasons as set out in 4.7.11 above.
5.4.2 Policy – Access to minerals and extractive industries (d)Avoid the location of any sensitive land use within specified buffer areas which otherwise risks the	Support	

effective operation of a lawfully established extractive industry.		
Definition - Extractive industry Means taking, winning or extracting by whatever means, the naturally-occurring minerals (including but not limited to coal, rock, sand, and gravel) and peat from under or on the land surface. The term includes the processing by such means as screening, crushing, or chemical separation of minerals at or near the site, where the minerals have been taken, won or excavated. The term also includes the removal, stockpiling and filling of overburden sourced from the same site. It includes all activities and structures associated with underground coal gasification, including pilot and commercial plants and the distribution of gas. It excludes prospecting and exploration activities**.**	Support with amendment	This definition should be expanded to include all the activities associated with the extraction and processing of minerals. It should explicitly include: • blasting; • storing, distributing and selling mineral products; • accessory earthworks; • treating stormwater and waste water; • landscaping and rehabilitation; • cleanfills and managed fills; • recycling or reusing aggregate from demolition waste such as concrete, masonry, or asphalt; • accessory activities and accessory buildings and structures such as weighbridges, laboratories and site offices.

THE AGGREGATE & QUARRY ASSOCIATION OF NZ

AQA Submission Supplement – Waikato District Council Proposed Plan

Key points relating to quarries

Growing districts such as Waikato 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 not be allowed to encroach on them.

A particular challenge faced by the quarry sector and end-users is maintaining urban and urban-fringe quarries. Quarries need to be near towns and the destination of quarry materials. 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 need to be taken account of 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. 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, then 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.