

02 June 2009

Proposed Regional Policy Statement
Greater Wellington Regional Council
PO Box 11646
Manners Street
TAURANGA 6142

To whom it may concern,

**Submission on the Greater Wellington Regional Council Proposed Regional
Policy Statement
HG Ref 1820-128386-01**

Please find attached a submission on the Proposed Regional Policy Statement on behalf
of the Aggregate and Quarry Association of New Zealand (Inc).

If you have any queries in respect of this submission, please do not hesitate to contact
me on (04) 385 0005 or by email a.brown@harrisingrierson.com

Yours Sincerely
Harrison Grierson Consultants Limited



Amber Brown
Planner

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SUBMISSION ON A PUBLICLY NOTIFIED PROPOSAL FOR A POLICY STATEMENT

Under Clause 6 of The First Schedule to The Resource Management Act 1991

To: Greater Wellington Regional Council

Submission on: Proposed Wellington Regional Policy Statement

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1.0 INTRODUCTION

1.1 The Aggregate and Quarry Association of New Zealand

The Aggregate and Quarry Association of New Zealand (inc) ("AQA") was formed in 1969 by companies involved in extracting and supplying gravel and allied materials in New Zealand, in response to the need for an industry group that could represent aggregate suppliers on a range of issues. Membership of the AQA stands at over 80 companies, which between them produce 85% of the aggregates and allied raw materials used in New Zealand.

The members of the AQA take their responsibilities regarding the environment seriously, and the AQA is committed to advocating for its member companies to avoid, remedy or mitigate the adverse environmental effects of their operations on the surrounding environment. In recognition of this, the AQA seeks a regional resource management regime that supports the companies' commitment to the management of environmental effects, but one which recognises the significance of aggregates in our day-to-day lives.

1.2 The Significance of the Aggregate Resource

Minerals are essential for the development of New Zealand generally. Minerals of economic value in New Zealand include aggregates, precious metals, industrial minerals and coal. These minerals are used in a variety of processes, including for jewellery, industrial processes, fuel and in the construction of our towns, cities and roads. Most mineral deposits including aggregates are fixed in location, unevenly distributed and are generally a non-renewable resource.

The AQA consider that aggregate resources are important to the Wellington region and further that it is important that the region seeks to provide for its own aggregate needs from within its boundaries. We note that failure to enable extraction of the aggregate resources would have significant cost implications. In this regard it is noted that for every 30km that aggregates have to be transported the cost of the aggregates doubles. This in turn effects the cost of the roads, infrastructure, buildings and houses which aggregates are used to construct.

Aggregates play an essential part in the lives of everyday New Zealanders. Without an ongoing supply of aggregate the development of buildings, roads, motorways, all infrastructure and the production of concrete would stop.

We note that in 2007 alone, 46 million tonnes of aggregates were produced worth \$592 million. The population of New Zealand at 31 December 2007 was estimated at 4,250,000 and the consumption of aggregates was 10.99 tonnes per person. These statistics reiterate the significance and prevalence of aggregates in New Zealand and to New Zealanders and the consequent need to continue to meet the demand for this resource.

1.3 Hearing

The AQA do wish to be heard in support of this submission.

If others make a similar submission, the AQA will consider presenting a joint case with them at a hearing.

2.0 REGIONAL POLICY STATEMENT

2.1 AQA Submission

The AQA consider there are three broad issues that should be recognised in the Regional Policy Statement in order to promote the sustainable management of the aggregate resource. These are:

- 1) Recognise the values and benefits of aggregates as an important resource to the region;
- 2) Manage the location of sensitive land use activities so that these do not create reverse sensitivity effects on quarrying operations; and
- 3) Manage the environmental effects of the extraction of aggregates in a manner that recognises benefits of use and functional and locational constraints.

Section 5(2)(a) of the Resource Management Act 1991 promotes the management of the use, development and protection of natural and physical resources in a way, or at rate, that enables people and their communities to provide for their social, economic and cultural well being and for their health and safety. While minerals are excluded from the requirement to sustain the potential to meet the reasonably foreseeable needs of future generations, providing for their extraction, managing the effects of their extraction and managing the effects of other activities on their extraction are relevant RMA matters.

The AQA consider that through Policy 60, Objective 30, Method 51 and the cross referenced policies, objectives and methods the proposed RPS does address the abovementioned key issues. However, it is noted that Policy 60 is not a plan requirement but is a matter to be considered and given particular regard when deciding on resource consents or when changing or varying district or regional plans.

The AQA consider an additional policy should be incorporated into the RPS as plan requirement to ensure that it will be given effect to in regional, city and district plans.

2.2 Decision Sought

Include an additional policy in the section 4.1 of the proposed RPS as follows:

District and regional plans shall include policies, rules and/or methods that:

- a) recognise the social, economic, and environmental benefits from utilising mineral resources within the region; and
- b) protect the extraction and processing of significant mineral resources from incompatible or inappropriate land uses alongside.

3.0 SOILS AND MINERALS CHAPTER

3.1 AQA Submission

The AQA supports this chapter in part.

The Proposed RPS recognises that in the Wellington region, sand, rock, gravel and limestone are mined from rivers, beaches, coastal cliffs and inland quarries. As the region's population continues to expand, the demand for mineral resources, particularly aggregate will increase. Mineral resources are fixed in location, unevenly distributed and finite. Extraction processes, sites and transportation routes can create adverse environmental effects. If activities sensitive to the effects of extraction and processing are established nearby, reverse sensitivity can arise.

The AQA applauds Wellington Regional Council's efforts to recognise minerals within chapter 3 of the proposed RPS as a regionally significant resource management issue. However, the AQA would like to see greater differentiation between aggregates and minerals.

Aggregate resources have particular importance in the development of the region, particularly in providing the raw materials that have critical input into producing infrastructure that is important to the region. Transport infrastructure such as roads, railways, paths, airports, sea ports, together with water supply, stormwater and waste water networks all have substantial built components requiring aggregates.

The economic value of aggregates to the region can be greater than other minerals such as gemstones etc and the AQA would like to see this reflected in the RPS.

3.2 Decision Sought

Retain Issue 5 and Objective 30 of Chapter 3.11.

Amend the explanation to this chapter to provide greater recognition for aggregates and their value to the region.

4.0 POLICY 1

4.1 AQA Submission

The AQA supports this policy.

Policy 1 states that district plans shall include policies and/or rules that discourage reverse sensitivity associated with odour, smoke, and dust.

The AQA is supportive of this policy as quarrying and mining operations can be impacted by reverse sensitivity effects from new incompatible sensitive activities locating near or alongside.

4.2 Decision Sought

Retain Policy 1.

5.0 POLICY 23

5.1 AQA Submission

The AQA supports this policy in part.

The RPS states that district and regional plans shall include, policies, rules and methods to protect indigenous ecosystems and habitats with significant biodiversity values from inappropriate subdivision, use and development.

The AQA is supportive of this policy, however believe that the RPS should provide guidance on what is deemed inappropriate subdivision, use or development.

5.2 Decision Sought

Include an additional policy that provides guidance on what inappropriate subdivision, use or development is.

The guidance should take into consideration the significance of any adverse effects, if the subdivision, use or development can be located elsewhere or is restricted to a particular locality and any benefits that it may generate.

6.0 POLICY 25

6.1 AQA Submission

The AQA supports this policy in part.

The RPS states that district and regional plans shall include policies, rules and/or methods that protect outstanding natural features and landscape values from inappropriate subdivision, use or development.

The AQA is supportive of this policy, however believe that the RPS should provide guidance on what is deemed inappropriate subdivision, use or development.

6.2 Decision Sought

Include an additional policy that provides guidance on what inappropriate subdivision, use or development is.

The guidance should take into consideration the significance of any adverse effects, if the subdivision, use or development can be located elsewhere or is restricted to a particular locality and any benefits that it may generate.

7.0 POLICY 54

7.1 AQA Submission

The AQA supports this policy in part.

The RPS states that when considering an application for a resource consent, or a change, variation or replacement to a district plan for urban development beyond the regions urban areas (as at March 2009), particular regard shall be given to whether:

- a) the proposed development is the most appropriate option to achieve Objective 21;
- b) the proposed development is consistent with the Councils growth and/or development framework or strategy that describes where and how future urban development should occur in that district; and/or
- c) a structure plan has been prepared.

The explanation of Policy 54 indicates the matters to be covered in a structure plan and includes provision for mixed land uses and densities, how environmental constraints are to be managed, integration with infrastructure services and adjoining land use activities, development staging and sequencing and how urban design principles will be implemented.

The AQA consider that Policy 54 and its explanation do not adequately direct consideration of potential reverse sensitivity effects when structure plans are prepared.

As such the AQA would like to see that Policy 54 makes a cross reference to Policy 60 in addition to the other cross referenced policies as there is benefit in utilising minerals from within the region and protecting mineral resources from reverse sensitivity effects in regional structure planning.

7.2 Decision Sought

Amend the explanation so that it more explicitly recognises the need to consider reverse sensitivity effects as part of structure planning and insert a cross reference to Policy 60 in Policy 54.

8.0 POLICY 60

8.1 AQA Submission

The AQA supports this policy in part.

Policy 60 directs that particular regard should be given to the social, economic and environmental benefits of utilising mineral resources within the region. It also requires that particular regard be had to protecting significant mineral resources from incompatible and inappropriate land use alongside.

The AQA applauds the inclusion of a policy that recognises the value and benefit of the resource as well as managing the location of sensitive land use activities so that these do not create reverse sensitivity effects on quarrying operations.

However, the AQA would like to note that in regard to clause b) it is not only the mineral resource that should be protected from incompatible or inappropriate land uses alongside. The extraction and processing of the mineral resource should also be protected.

8.2 Decision Sought

Amend Clause b) of Policy 60 as follows:

Protecting significant mineral resources and their extraction and processing from incompatible or inappropriate land uses alongside.

9.0 METHOD 51

9.1 AQA Submission

The AQA supports this method in part.

The RPS states that when implemented, Method 51 will identify the locations of significant mineral resources within the region.

While the AQA are supportive of this method, we note that the process by which the mineral resources are identified is not stipulated, nor how the identification of the resources will be shown i.e if they will be mapped or other. The RPS does not provide a timeframe that states when the locations will be identified and hence the AQA consider this method may fall to the way side or not be prioritised as a result. The AQA also respectfully request that GWRC engage and consult with the AQA in this process.

9.2 Decision Sought

The RPS stipulate how Method 51 will be achieved, the process of identifying the significant mineral resources, how this will be shown and the timeframe within which to achieve it.

GWRC also agree to engage and consult with the AQA in identifying the locations of significant mineral resources within the region.

Amber Brown
Planner

Signature 

Date 02. June. 2009

On behalf of the Aggregate and Quarry Association of New Zealand (Inc)

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