

Comments on the Canterbury Land Use Recovery Plan

To: Canterbury Regional Council
Freepost 1201
Land Use Recovery Plan
PO Box 345
Christchurch 8140

Submitter: Canterbury Aggregate Producers Group.

Canterbury Aggregate Producers Group (CAPG)

The CAPG members are aggregate production and quarry operators from within the Canterbury Region. The members of the CAPG are (in alphabetical order):

- I. Blackstone Quarries;
- II. Christchurch Readymix Concrete Limited;
- III. Fulton Hogan Limited;
- IV. Isaac Construction Co Limited;
- V. KB Contracting & Quarries Limited;
- VI. Road Metals Limited;
- VII. Selwyn Quarries Limited;
- VIII. Taggart Earthmoving Limited; and
- IX. Winstone Aggregates - a Division of Fletcher Concrete and Infrastructure Ltd.

The CAPG undertakes numerous activities across the Canterbury Region including:

- Gravel extraction, both within river beds and within land-based quarries/pits;
- Aggregate processing, storage and supply;
- Land use and infrastructure development and maintenance activities, either directly or on behalf of third parties (including roading contracts for the State Highway on behalf of the NZ Transport Agency, and local roads on behalf of a number of territorial authorities, capital and maintenance projects at ports and airports);
- Asphalt and bitumen manufacture, bulk storage and surfacing;
- Pre-cast concrete manufacture and storage;
- Concrete production for industrial, commercial, public and residential building construction and maintenance;
- Cleanfilling facilities for disposal or reuse of cleanfill material;
- Hazardous substance use, transport and storage; and
- Workshops, transport depots, storage yards, staff offices, and supporting infrastructure (including wastewater, stormwater, and potable water).

The CAPG collectively operates extensive transport fleets of trucks, trailers and other specialised aggregate production and construction equipment across the Canterbury region. The group also collectively employs more than one thousand skilled staff to operate this machinery and plant.

Importance of Aggregates in the Canterbury Region

Aggregates are a fundamental building block of communities whose ubiquitous use across all aspects of the built environment is frequently under-recognised. The production and use of aggregates is as vital for the maintenance and rebuilding of existing communities as it is crucial to their growth, development and enhancement. A reliable and economically-viable supply of aggregate is essential for the continued recovery and development of the Canterbury region, and to enable the people and communities of Canterbury to provide for their social, economic and cultural wellbeing.

In particular, a sustained supply remains absolutely critical over the next decade to enable reconstruction and repair work arising from the Christchurch earthquakes sequence. It must also provide for 'business as usual' demand to cope with building and development associated with population growth, maintenance of existing buildings and infrastructure, and key infrastructure projects within the region (such as housing and business redevelopment and those proposed by NZTA including the Christchurch Motorways Package).

Within Canterbury, the availability of aggregates in relatively close proximity to areas of demand is directly related to cost. Longer transport distances and requirements for multiple handling of product between the raw and processed form has a correspondingly greater effect on price. At a fundamental level, this cost influences where new development will occur (by affecting financial viability), and the extent to which the maintenance of existing infrastructure is to occur (by influencing, for example, the affordability and scope of infrastructure redevelopment). Accordingly, constraints on the ability to extract and process aggregates in relatively close proximity to the source of demand will negatively affect the sustainability of Canterbury's communities. On the other hand, the ready availability of strategic aggregate resources and the ability to process this material at or close to source will provide a significant stimulus into the Canterbury regional economy. It will also strongly influence the sustainability of communities.

Aggregate supply across Canterbury, particularly in proximity to the greater Christchurch area, is entering a period of significant uncertainty and change. Areas that have traditionally provided aggregate resources to supply the Canterbury population are facing increased regulatory barriers and supply depletion, and new sources are not readily apparent.

A number of studies have been undertaken in recent years¹ which have concluded that the demand for aggregates is increasing while aggregate reserves, including sustainable river yields, are diminishing. Where proximate supplies of aggregates (and the associated supporting activities) are constrained, this will directly affect the pace and cost of recovery for the metropolitan greater Christchurch area.

It is within this context that the CAPG provides these comments on the LURP. The broad scope of activities associated with the aggregates industry – extraction, processing, transporting, cleanfilling, etc – should be recognised and provided for within the policy and planning framework necessary to rebuild existing communities, develop new communities, meet the land use needs of business, and rebuild and develop the infrastructure needed to support these activities.

General Comments on the Land Use Recovery Plan (LURP)

It is understood that the Land Use Recovery Plan has deliberately excluded some matters such as the recovery of resources (e.g. water, air, soil, minerals, etc) as per paragraph 1.2. Notwithstanding this, because of the fundamental importance of aggregates for the myriad elements of the rebuild and recovery process, the CAPG believes that consideration of "aggregate extraction" (reflecting the full gamut of activities) should be provided for in this document. As discussed above, the enablement of aggregate extraction and the transportation of aggregate is vital in providing for the re-build recovery. A supportive and enabling regulatory environment, which recognises the fundamental importance of the aggregates industry and associated activities to reconstruction and the maintenance of sustainable communities, and provides for this activity, will greatly enhance the Economic Recovery Programme for greater Christchurch.

¹ See, for example, "*Regional Gravel Management Report*" Report No R06/1, Environment Canterbury, January 2006, and the "*Canterbury Regional River Gravel Management Strategy*" October 2012.

2.0 Vision and Goals

Under section 2 of the Plan, Vision and Goals, the CAPG suggests that an additional goal should be added. This would state:

Enable those industries that provide materials which are essential to the Canterbury rebuild, and not unduly constrain their operations, by restricting the establishment of sensitive developments in the vicinity of them.

3.2.4 What are the land use issues for transport?

The transportation of aggregates, cleanfill and associated materials central to the rebuild and recovery programme is becoming subject to increasingly restrictive provisions. Restrictions on the vehicle movements associated with aggregates supply (in all its forms) can significantly adversely affect the efficient supply to the rebuild programme. The CAPG suggests that the inclusion of the following paragraph in this section is appropriate:

The demand for aggregates to supply the Canterbury rebuild and recovery programme is at an all-time high. Provisions to provide for and enable efficient transportation of these aggregates is essential to enable the efficient rebuild of Canterbury. Such provisions should not unduly limit or restrict the transportation of aggregates or cleanfill materials.

4.0 A plan to lead recovery

The CAPG suggests that the following actions should be included within the LURP to provide for the essential aggregate supply and transportation for the Canterbury rebuild:

Action 11: Christchurch City Council District Plan Review

iv. Enabling, through quarrying and transportation provisions, a sustained supply of aggregates to the Canterbury Region to help facilitate the Canterbury rebuild.

Action 45: Christchurch City Council District Plan Review

Include the following bullet point:

- Provide for Aggregate extraction industries in the rural zone

The CAPG would welcome the opportunity to speak to these comments.

Signed on behalf of
The Canterbury Aggregate Producers Group

Geoff England



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Address for Service of Submitter:

c/- Winstone Aggregates
PO Box 17195
Greenland
Auckland 1546

Attn:
Geoff England
Resource Management Planner

Phone 0273460587
Email Geoff.england@winstoneaggregates.co.nz