

Submission from the AQA on Plan Change 50 Upper Hutt District Plan

September 2021

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing construction material companies which produce 45 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.

AQA welcomes the opportunity to submit on [Plan Change 50](#) of the Upper Hutt District Plan. We generally support the draft plan change subject to the recommendations which are made in this submission.

Key Points

1. We support the 'discretionary' activity status of quarrying in the General Rural and Rural Production Zones.
2. We recommend amending the Objectives and Policies of the Rural Production Zone to make it clear that quarrying activities are included within the definition of Primary Production (as it is in the National Planning Standards).

General Comments – Upper Hutt and Aggregate Supply

Even though there is currently no significant quarrying activity in Upper Hutt City, it is important that future potential activity is accommodated in the Council's planning.

Sand and aggregate and other products produced by the sector are essential inputs for construction, housing, roading and other infrastructure development. As Upper Hutt City grows its population and economy, there will be increased demand for quarry products. This comes at a time where growing demand across New Zealand means current supplies are being exhausted nationally.

Quarry products are largely brought in from outside the district and the distances transported can be quite large adding significant costs to the product. An additional 30km travel typically doubles the cost of aggregate.

It is important to note, aggregates are a site-specific resource, which means that extraction can only occur where the resource is found and can be economically extracted and transported to local markets.

As well as increasing demand for sand and aggregate, the expanding development of Upper Hutt City will potentially put pressure on access to prospective quarrying land. For these reasons, it is essential that council planning allows for this growth as well as future needs by not closing down access to potential quarrying land.

AQA is working with central government to increase knowledge of the location of mineral resources in New Zealand. Based on our existing knowledge, it is quite likely that significant commercially viable resource lies within the district.

It is important that the Council takes steps to ascertain where such aggregate and mineral resources lie and ensure the district planning process does not preclude current and future access to them.

Not doing this, could mean lost opportunities for accessing a supply of sand, aggregates and other minerals which are an important input in developing the infrastructure necessary to enable Upper Hutt's anticipated growth as well as a valuable resource in itself.

Specific Comments on the Plan Change

We are pleased quarrying is allowed for in the Plan Change. We support [the 'discretionary' activity status](#) of quarrying in the General Rural and Rural Production Zones.

While the plan is generally supportive of quarrying, there are places where this support could be clearer. Most importantly, for example, quarrying seems to be secondary to other primary production sectors in the Plan Change (eg agriculture) whereas quarrying is an indispensable primary industry as supported by the National Planning Standards which include quarrying in the definition of Primary Production.

In the [Rural Production Zone objective and policies](#), for example, (RPROZ-01 – Rural Production Zone Purpose and RPROZ Policies 1-5), there are several references to highly productive soils.

For example RPROZ-01 – Rural Production Zone Purpose

The Rural Production Zone provides for all primary production and rural industry, existing in areas dominated by highly productive soils in valley floors at a flat to gently-sloping terrain.

And, RPROZ-P1 – Rural production zone land use

Enable primary production activities that seek to utilise highly productive soils, including associated production activities

As mentioned above, aggregates are a location-specific resource and land that comprises suitable rock should also be protected the same way that the plan change seeks to protect highly productive soils.

Quarrying is the most highly productive use of land for primary production, producing several times the revenue per land mass as other primary activities. In most cases is also a temporary land use, with site restoration a critical element to ensure that land is available for future generations.

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