

Submission from the AQA on the Draft Wellington District Plan December 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 to Wellington City Council on the [Draft Wellington District Plan](#). Our submission is focussed on the provisions relating to quarries and the need to plan for a secure supply of aggregate to meet increasing demand.

Key Points

- Wellington's aggregate supply is seriously constrained, and current production is insufficient to meet the growing demand for aggregate in the region including for many public infrastructure projects.
- It is essential that the District Plan does not unreasonably curtail the expansion of existing quarries, or the establishment of new quarries.
- This particularly applies to the area along the fault line adjacent to the Hutt Road where much of the available rock in Wellington is located.
- The District Plan must allow for the anticipated aggregate demand by planning for new and expanded quarries in Wellington and enabling the importation of aggregate from further afield.

Part 1 - General Comments on Aggregate and the Wellington Situation

Aggregate (crushed rock, gravel and sand) is an essential resource for the construction sector, for housing and transport infrastructure and for climate change adaptation.

Due to unprecedented levels of construction and infrastructure development activity, aggregate is increasingly in short supply in many parts of New Zealand including the Wellington region.

The quarry sector has an important role to play in providing the to support New Zealand's growth.

Characteristics of Aggregate

It is important to realise, aggregate is a locationally constrained resource. Quarrying can only occur where suitable aggregate resource exists. It is therefore important to ensure that access to potential aggregate resources is not inadvertently shut off by competing land uses - many of which could, by their nature, be located anywhere.

This means that council planning must identify where the rock is located and protect those areas from other development and prevent sterilisation by alternative land uses.

Due to its weight and volume, aggregate is very expensive to transport. An additional 30km 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.

Quarrying activities generate environmental impacts (eg truck movements, dust and noise) and therefore quarries need to be an appropriate distance from residential and other sensitive areas. Quarries can and do mitigate these environmental affects and we comment on some of these provisions in the draft plan in part 2 of the submission.

Aggregate Supply Constrained in Wellington

As Wellington City Council is aware, Wellington is significantly constrained in its aggregate supply¹. A lot of the potential rock resource has been built upon over many decades or is difficult to access. The considerable demand for aggregate anticipated as Wellington's population grows and the historic infrastructure deficits and housing shortages are addressed means a shortfall is expected.

There are a number of specific infrastructure projects in the pipeline, public and private sector, that will require significant amounts of aggregate. Te Ara Tupua, the walking and cycling link between Wellington and Petone, for one, will require sizable volumes of rock for the significant reclamation and seawall strengthening which is planned. In addition to this, the LGWM projects and other regional transport projects, the possible runway extension, CBD apartment buildings and new housing generally, will all require significant amounts of aggregate.

Projections show by 2040 Wellington City's population will increase by 55,000 over the city's population in 2006. Wellington will need 15,000 more dwellings over the next 20 years to accommodate growth.

Shortages of aggregate have been looming for some time now. They were a significant factor holding up the completion of Transmission Gully which in turn created significant disruption to aggregate supply for other projects in the region.

¹ In the [Regional Demand Forecasts for Aggregates in Wellington](#) paper prepared for the Wellington City Council, Spire Consulting Ltd

Clearly, the quarry sector has an important role to play in the current and future growth of Wellington and the wider region and it needs to be accommodated in the District Plan.

This means allowing for the anticipated aggregate demand by planning for new and expanded quarries in Wellington and enabling the importation of aggregate from further afield.

As the council's research has shown², much of the available rock seam runs along the fault line adjacent to State Highway 2. This is where Wellington City's two existing quarries are located (and further north, Belmont Quarry in Lower Hutt City) and it is an area where new or expanding quarrying activity is likely to occur. For this reason, as specified in Part 2 below, we ask that the draft plan does not unreasonably curtail the expansion or establishment of quarries in this area.

There may be other parts of Wellington City where it becomes economic for the resource to be accessed, and while these may be less likely than the area along the fault line, they shouldn't be ruled out.

The Plan should also provide for the importation of product from outside the Wellington City area, whether from elsewhere in the region or further afield.

Coastal shipping could be part of the solution and the District Plan should ensure there are no barriers to this, both in terms of CentrePort (owned by Greater Wellington Regional Council and Horizons Regional Council) and other supporting infrastructure.

Part 2 – Provisions Relating to Quarrying in District Plan

We support most of the provisions relating to quarrying in the District Plan. We make the following specific points.

Definitions

The definitions of **Quarry and Quarrying Activities** are taken from the National Planning Standards. We support the use of these definitions.

We recommend consistency with the National Planning Standards definitions, throughout the draft plan to avoid confusion and potential duplication.

Special Purpose Quarry Zone

We support the use of Special Purpose Quarry Zones for Wellington City Council.

In the Draft Plan the Special Purpose Quarry Zone applies to the Kiwi Point Quarry - which is owned by Wellington City Council. Wellington's other significant quarry,

² [Regional Demand Forecasts for Aggregates in Wellington](#)

Horokiwi, and any new yet-to-be established quarries are covered by provisions in the General Rural Zone.

It is important that this dual system does not provide advantages to one over the other and does not result in an uneven playing field between operators. We are broadly satisfied this is the case. Most importantly the provisions in both the special zone and the general zone should not pose unnecessary barriers to quarrying activities.

Significant Natural Areas and Special Amenity Landscapes

We recognise the importance of protecting significant natural areas and landscapes but given the locationally constrained nature of quarrying, as discussed earlier in this submission, it is important that some flexibility is available to quarrying. We note that the need to provide flexibility is increasingly the view of central government as it revisits the setting of national direction for activity around Natural Wetlands and the National Policy Statement for Indigenous Biodiversity.

Coastal Environment Overlay

As stated above, much of the available rock in Wellington runs along the fault line, adjacent to State Highway 2. The presence of the new coastal environment overlay in this area must not become a barrier to new or expanding quarries in this area. As with Significant Natural Areas, it is important that some flexibility is available to quarrying.

General Rural Zone

Provisions specific to quarrying in the General Rural Zone are limited. We generally support them as they seem to balance the needs of the existing quarries and the general community quite well.

As stated above, it is important that the Draft Plan does not unreasonably curtail the expansion or establishment of new quarries in the General Rural Zone.

Adverse Effects

We support **GRUZ-P4** which allows quarrying activities in the General Rural Zone where it can be demonstrated that the adverse effects can be managed through industry best practice, management plans, monitoring and self-reporting

Rehabilitation

We support **GRUZ-P5** which requires any new mining or quarrying activities and changes of use on existing quarry or mining sites to demonstrate, through a detailed Management Plan, how the site will be rehabilitated.

We support the points listed which need to be considered in terms of site rehabilitation.

Aggregate extraction is a temporary land-use whereby the aggregate material is extracted and processed before the area is rehabilitated to a former use, or an

alternative and/or enhanced use. Responsible environmental management using best practice approaches is an integral part of any aggregate extraction and processing venture.

Activity Status

We support the Discretionary Activity Status for quarrying or mining activities in the General Rural Zone as provided for in **GRUZ-R12**.

Noise

The way that the noise limits in **App 5** are measured is not best practice by New Zealand standards and we recommend changing this.

Best practice in New Zealand is to measure the noise:

1. from the nearest sensitive activity, not at the boundary
2. over the full period of operation rather than a 15 minute period.

Rather than the 65 dB LAeq (15 min) in the draft plan, for both GRUZ and SPQZ, we recommend 55 dB LAeq measured at the nearest sensitive activity

Earthworks

There is a separate chapter on earthwork activities.

We support the note in the Application of the Chapter Rules which states "the provisions of this chapter do not apply to quarrying activities provided for in the Special Purpose Quarry Zone".

It is important to make this clear to avoid confusion and potential duplication and inconsistency given quarrying is a unique activity and it is right that it should be specifically addressed elsewhere through the relevant zone rules separate from earthworks.

Wayne Scott
Chief Executive Officer
[Aggregate and Quarry Association](mailto:wayne@aqa.org.nz)
wayne@aqa.org.nz
021 944 336