

Submission from the AQA on the Proposed Wellington District Plan

September 2022

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing construction material companies which produce 50 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.

We would like to thank the Wellington City Council for the opportunity to comment on the [Proposed District Plan](#).

General Comments on Aggregate and the Wellington Situation

Importance of Aggregate

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, there is growing demand for aggregate which is in short supply in many parts of New Zealand including the Wellington region.

Characteristics of Aggregate

Aggregate is a locationally constrained resource. Quarrying can only occur where suitable aggregate resource exists.

It is therefore important that the District Plan does not shut off access to potential aggregate resources. Council planning must identify where the rock is located and protect those areas from other development and 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.

Aggregate Supply Constrained in Wellington

As Wellington City Council is aware, Wellington is significantly constrained in its aggregate supply. 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 continued shortages are expected.

Aggregate shortages 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.

Quarrying and the Wellington District Plan

Clearly, the quarry sector has an important role to play in providing the necessary aggregate for the current and future growth of Wellington and the wider region, and it needs to be accommodated in the District Plan. This means planning for new and expanded quarries in Wellington and enabling the importation of aggregate from further afield.

As the council's research has shown¹, 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. The District Plan should 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.

Provisions Relating to Quarrying in District Plan

City Economy, Knowledge and Prosperity

A key focus of the upcoming resource management reform is to plan for positive outcomes and not just manage adverse effects. The Proposed Plan is effects-based and so there is a focus on the latter and minimising the effects of activities such as quarrying. This approach is not able to take account of the of benefits of quarrying and its importance to the local economy, as outlined in the previous section.

One way to acknowledge the positive outcomes and the necessary contribution quarrying makes to Wellington would be to include a reference to quarrying in the City Economy, Knowledge and Prosperity section, possibly in **CEKP-O5** which refers to 'strategically important assets'.

Definitions

The definitions of **Earthworks, Quarry and Quarrying Activities** are taken from the National Planning Standards. We support the use of these definitions and National Planning Standards definitions generally throughout the draft plan to avoid confusion and potential duplication.

¹ [Regional Demand Forecasts for Aggregates in Wellington](#)

See our comment below on the definition of **Rural Activities** which is not defined in the National Planning Standards but creates a potential conflict with regard to quarrying activities.

Special Purpose Quarry Zone

We fully support the use of a Special Purpose Quarry Zone for Wellington's existing quarries and particularly support the proposed new inclusion of Horokiwi Quarry within it. The current Quarry Zone incorporates council-owned Kiwipoint Quarry only which is inappropriate.

The rules and objectives of the Quarry Zone are relatively enabling, and this is supported but there are some potential conflicts with other parts of the plan. To provide certainty, there should be a statement that clarifies that where such conflicts occur the Quarry Zone provisions should prevail.

The enabling provisions of the Quarry Zone relate to existing quarries within the zone but do not apply to potential quarrying activities or the expansion of an existing quarry within the zone. This needs to be addressed.

Given Wellington's need for more quarry material, as set out in the earlier section, it is important that the District Plan does not preclude potential development of new quarries in areas outside the Quarry Zone.

Overlays

The Proposed Plan has a significant number and area of overlays, including Significant Natural Areas (SNAs), Special Amenity Landscapes and Coastal Environment. Many of these could impact existing and potential quarrying areas both inside and outside the quarry zone.

We have two general concerns relating to overlays:

1. While quarrying activity within an overlay area is not always disallowed/impossible, the provisions within them are very restrictive.
2. It is not certain that in all cases areas warrant their special status. We note the work done by Horokiwi Quarry in particular which has ecological advice challenging the status in some areas.

We recognise the importance of protecting significant natural areas and landscapes but given the locationally constrained nature of quarrying and the need for new resource to be developed, as discussed earlier in this submission, it is important that flexibility is available to quarrying.

We support **ECO-P1** which provides for an effects management hierarchy for land development, including offsetting and compensation, within Significant Natural Areas.

ECO-P2 invalidates a lot of this as the sub-points are unlikely to apply to quarrying activities. To rectify this, we recommend adding a point that enables vegetation clearance where the existing activity is a legal activity. Together with the other policies,

this will achieve the right balance between protection of appropriate vegetation and allowing essential economic activities.

We note that provision of a consenting pathway rather than overly restrictive measures is increasingly the preference of central government as it revisits the setting of national direction for activity around things like 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 Coastal Environment overlay is a barrier to new or expanding quarries in this area. It extends too far from the coast and does not provide the right balance between coastal protection and enabling access to aggregate. We recommend the boundary be shifted accordingly. In particular the overlay overlaps with the Quarry Zone and the Horokiwi Quarry site and so needs to be adjusted here to avoid interfering with new and existing workings.

As with Significant Natural Areas, it is important that some flexibility is available for quarrying to access a consenting pathway. **CE-P1** provides for development but it focuses on urban development. It should be amended to refer to existing lawful activities such as quarries

New and Expanding Quarries

As discussed earlier in the section, there is a need for more quarrying activity to meet increasing demand. There is insufficient regard in the Proposed Plan for the expansion of existing quarries as well as greenfield quarry development inside and outside the Quarry Zone.

We are also aware of proposals to expand existing quarries into areas outside and adjacent to the Quarry Zone and these will need to be accommodated within the Plan. Specifically, the quarry zone should be expanded to include identified areas of potential resource resources adjacent to existing quarries.

It is possible that future aggregate sources will be located in the General Rural Zone and new quarries will be needed there. It is therefore important that the provisions within this zone are enabling for quarrying.

General Rural Zone

We support **GRUZ-01** which describes the 'purpose of the General Rural Zone'. In particular we support the reference to 'functional need' which means the need for an activity to operate in a particular environment because it can only occur in that environment. This is particularly relevant to quarrying as discussed earlier in the submission in the Characteristics of Aggregate section, as quarrying can only occur where suitable aggregate resource exists.

We are concerned that the definition of 'rural activities', which is referred to in **GRUZ-01**, specifically excludes 'quarrying and mining activities'. The effect of this could be to inadvertently rule provision for them out of the General Rural Zone.

Using the term 'primary production' instead of 'rural activities' could be one way to address this as quarrying is included within the definition of that term.

Adverse Effects

We support **GRUZ-P4**, in particular sub-point 5 which specifically 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**.

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 distinct from earthworks. It is right that quarrying should be specifically addressed elsewhere through the relevant zone rules separate from earthworks.

The same distinction should be made for quarrying activities, existing and future, carried out in other zones, not just the Quarry Zone.

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