

# Submission to Greater Wellington Regional Council on the Proposed Change 1 to the Regional Policy Statement for the Wellington Region

October 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.

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.

We are grateful for the opportunity to submit on [Proposed Change 1 of the Regional Policy Statement for the Wellington Region](#) (RPS Change 1).

Our comments are focussed on the issues relevant to quarrying including the implementation of the National Policy Statement for Freshwater Management 2020 (NPS-FM) and issues related to climate change and indigenous biodiversity which are key foci of RPS Change 1.

## Aggregate and the Wellington Region

Wellington Region's aggregate supply is seriously constrained, particularly south of the Remutakas 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 region's planning does not unreasonably curtail the expansion of existing quarries, or the establishment of new quarries.

The region also needs to provide for the importation of product from outside the Wellington Region. Given the access issues to the area south of the Remutakas in particular, and the fact that that is where the shortages are, coastal shipping is bound to be part of the solution for Wellington. The region's planning 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.

## Comments on the Document

### Climate Change Chapter

An important part of RPS Change 1 is addressing issues related to climate change. It should be noted, aggregate is an essential resource for climate change adaptation.

Aggregates are needed to make infrastructure more resilient to resist extreme weather events. They will be required to build the structures that will protect against the effects of stronger storms, sea level rise and increased flooding on our infrastructure, including sea walls. They will also be at the fore in fixing damage as well as relocation and rebuild of infrastructure and housing. It should also be noted that sand, limestone and aggregates are an essential ingredient in cement and concrete manufacture.

Drought will not only impact on water supply, as specified on page 30. The resulting reduction in river flows will reduce the quality and quantity of aggregate deposits in rivers. The reduced aggregate from this source means there will be more pressure on hard rock, land based, aggregate sources.

### Chapter 3.9: Regional form, design and function

We support amendments to the Chapter Introduction in Part 2 '*Sporadic, uncontrolled and/or uncoordinated development*', specifically Part 2(b), on page 80:

*2. Sporadic, uncontrolled and/or uncoordinated, development (including of infrastructure) can adversely affect the region's compact form. This can, among other things, result in:*

*(b) development in locations that restrict access to the significant physical resource in the region – such as aggregate*

We agree. It is essential that access to potential aggregate resources is not shut off. Aggregate extraction is a locationally constrained activity. It can only occur where suitable aggregate resource exists. Council planning must identify where the rock is located and protect those areas from such development and alternative land uses.

### Chapter 4.2: Regulatory Policies – Policy 56

We support amended Policy 56: Managing development in rural areas – consideration, on page 153 which says:

*When considering an application for a resource consent or a change, variation or review of a district plan, in rural areas (as at August 2022), particular regard shall be given to whether:*

*(a) the proposal will result in a loss of productive capability of the rural area, including cumulative impacts that would reduce the potential for food and other primary production and reverse sensitivity issues for existing production activities, including extraction and distribution of aggregate minerals;*

We are pleased that regard is to be given to extraction and distribution of aggregate minerals as part of Primary Production in this Policy.

This is appropriate given quarrying is included in the definition of Primary Production in the National Planning Standards. It is also very important because even more so than other primary production activities, aggregate is a locationally constrained resource, as discussed above.

For this reason, it is important that access to potential aggregate resources is not shut off by other development and alternative land uses or reverse sensitivity.

Due to its weight and volume, aggregate is very expensive to transport which reinforces the case for council planning to identify where the rock is located and protect those areas from other uses. Quarries need to be able to operate in close proximity to urban populations because transport is the big cost in each truckload of delivered aggregate, rock or sand.

## **National Policy Statement – Freshwater Management**

A focus of RPS Change 1 is to start the implementation of the National Policy Statement for Freshwater Management 2020 (NPS-FM) which is soon to be finalised by central government. However, there are a number of issues relating to Natural Wetlands in NPS-FM, where decisions relevant to quarries are yet to be made. We draw attention to these here.

Under the existing NPS-FM, mineral and aggregate extraction is prohibited on land deemed to be natural wetlands, the definition of which is very broad. The Government is taking steps to amend this with a revised definition and by introducing a consent pathway for minerals and aggregates.

This will mean that applications for quarrying on wetlands can be considered along with the mitigation of effects, including offsets or compensation for any disturbance to wetlands.

The Government thinking in this area is clearly articulated on page 38 of this [report](#), issued in May 2022 and the proposal, as set out in 3.22(1)(d) of the [Exposure Draft of Amendments to the NPS-FM](#), is to allow quarrying where the regional council is satisfied that, among other things:

- extraction of the aggregate will provide significant national or regional benefits; and
- there is a functional need for the extraction to be done in that location

The rationale for this is that quarrying is a locationally constrained resource and also that it is a regionally significant activity given its importance in roading, housing and infrastructure development.

We note that this thinking has been reflected in the NPS - Highly Productive Land and it is likely that it will also be translated to the NPS-IB when it is released later this year. We discuss this further below.

The revised NPS-FM is expected to be released shortly and we recommend RPS Change 1 not be finalised before this.

### **Brief comment on the National Policy Statements for Highly Productive Land and Indigenous Biodiversity**

As noted above, the NPS Highly Productive Land has recently been released and the NPS-Indigenous Biodiversity is to be released later in the year. Needless to say, these also need to be incorporated into the Regional Policy Statement and one of the focuses of RPS Change 1 is to address issues related to indigenous biodiversity. We make the following comments as they relate to quarrying and the Regional Policy Statement.

The **NPS Highly Productive Land** protects highly-productive land from inappropriate subdivision, use and development. Land associated with quarrying/aggregate extraction is included in this protection.

The document's main focus is agriculture and other soil using industries. However, land containing minerals and aggregates is highly productive – quarrying generates many times more revenue per hectare than dairy, beef/lamb or horticulture. Quarrying is part of the definition of Primary Production in the National Planning Standards and, as stated earlier, because of high transport costs quarrying land needs to be near / on the outskirts of cities. It is as vulnerable to urban sprawl and competing land uses as agriculture and other soil using industries are.

Under 3.9(2)(j)(iv) of the NPS, the protection is given where the aggregate extraction:

- provides significant national or regional public benefit, and
- where there is a functional or operational need for the extraction to be on that land.

The **NPS Indigenous Biodiversity** is due for release later this year.

Consistent with the NPS Freshwater and Highly Productive Land, discussed above, the Exposure Draft for the NPS-IB, released in June this year, also provides a consenting pathway for quarrying. This is covered in clause 3.11(2) which, like these other two

instruments, includes aggregate extraction that provides significant national or regional public benefit that could not otherwise be achieved domestically, and there is a functional or operational need for the new use or development to be in that particular location. It is important to note this likely change to the NPS when it is released.

We are raising this in this submission because this recognition of quarrying by central government and the approach to not precluding it is increasingly prevalent in its national direction, including as part of the new resource management reform and the RPS should therefore be consistent with it.

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