

Submission from the AQA on the Wairarapa Combined District Plan Review

December 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 three Wairarapa district councils for the opportunity to comment on the [Draft Combined District Plan](#).

Combined Plan

We support the idea of a combined plan for the three Wairarapa councils and are pleased the three councils have resolved to continue having a Combined District Plan. A combined plan for the three districts makes sense given the size of the councils and the desirability of consistency for businesses operating across the Wairarapa.

Key Points

- The plan needs to reflect a shift from river-based gravel extraction to landbased quarrying which is a likely trend in the Wairarapa.
- Council planning must identify where rock and aggregate is located and protect those areas from other development and alternative land uses.
- We oppose the 'restricted discretionary' and 'discretionary' activity statuses given to quarrying in GRUZ-R11 and MPZR15 and recommend they be changed to 'permitted' to be consistent with GRUZ-R5. The requirements of GRUZ-P5 could be met by an Environmental Management Plan reported to Council annually.
- We recommend the Plan not be finalised before the release of the NPS-Indigenous Biodiversity and changes to the NPS Freshwater Management, and it incorporate these as well as the recently released NPS Highly Productive Land.

General Comments on Aggregate and the Wairarapa

Importance of Aggregate

This submission focuses on issues in the Plan as they relate to the aggregate and quarrying sector.

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 Wairarapa.

Aggregate and the Wairarapa

In the Wairarapa aggregate supply is mostly sourced from rivers not from land based sources.

River flows are becoming more and more inconsistent – and this trend is likely to intensify as climate change increases. This means the available supply, and quality, of river-sourced gravel for extraction will likely contract over time and there will be more need for land based, aggregate and rock sources in the Wairarapa.

In addition to this, increasing development for building and infrastructure in the coming years is putting increased pressure on this aggregate supply generally.

There are aspects of the Plan that need to be amended to reflect the need for this new focus.

Characteristics of Aggregate

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

It is therefore important that the Combined 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. We are happy to assist in identifying such resources.

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.

Specific Comments on the Plan

We broadly support GRUZ-P5 which sets out the conditions quarrying activities have to demonstrate.

Definitions

The definitions of **Earthworks**, **Primary Production**, **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.

Reverse Sensitivity

We support GRUZ-P6 (1) on reverse sensitivity. Due to the nature of extractive industry operations - including noise, vibration and dust, non-compatible land uses, such as residential areas, must not be allowed to encroach upon these operations or their surrounding areas. This is for the benefit and comfort of residents as much as it is to prevent disruption to extractive operations.

With regard to GRUZ-P6 (4), while we agree there should be adequate separation distances between sensitive activities and quarrying activities, we caution against the non-specific wording in GRUZ-P6 (4) specifically, 'adjacent to urban areas'. Quarries need to be close to urban areas because of the significant expense of transporting bulky quarry materials. As mentioned earlier, the cost of a tonne of aggregate doubles when it has to travel 30 kilometres from a quarry, with additional costs for each extra kilometre travelled thereafter. There are also significant additional carbon emissions associated with increased cartage distances.

In determining a reasonable distance for residential areas from potential quarry areas, both the risk of reverse sensitivity and these transport costs need to be taken account of.

Activity Status

We support the permitted activity status for quarrying activities as stated in GRUZ-R5.

GRUZ-R11(2) seems to be written for river extraction and not land based hard rock quarries. We say this because of the existence of GRUZ R5 and the fact that GRUZ-R11(2)(c) refers to quarrying sites where there is no processing (including crushing, screening, washing, and blending). With river extraction it is common for the gravel to be transported away from the extraction area to be processed elsewhere.

Thought needs to be given to the implications of this, particularly as the Wairarapa is likely to move towards land based quarrying. We do not see the need for this distinction in the activity status of river extraction and land based quarrying. We oppose the 'restricted discretionary' and 'discretionary' activity statuses given to quarrying in this clause and recommend it be 'permitted' consistent with GRUZ-P5.

Environmental Management Plans addressing the issues contained in GRUZ_P5 would seem a sensible and practical way of insuring permitted quarrying activities meet the requirements of the Wairarapa Combined District Plan. Such plans could be reported on to Council annually.

Likewise, the same change should be applied to MPZ-R15, i.e. it be 'permitted' with the requirement to submit an Environmental Management Plan annually.

National Direction Documents

The NPS Highly Productive Land has recently been released and the NPS-Indigenous Biodiversity and changes to the NPS Freshwater Management (2020) are due to be released shortly.

These National Direction documents are important to the quarry sector because of the consenting pathway they will provide. They will need to be incorporated into the combined plan eventually and we recommend the Plan be updated to incorporate the NPS Highly Productive Land and the NPS-Indigenous Biodiversity and NPS Freshwater Management once they have been finalised and released.

We make the following comments on these documents as they relate to quarrying.

Under the existing **NPS Freshwater Management**, 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 is expected to take effect before the end of 2022.

The Government's 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.

This thinking has been reflected in the recently released **NPS Highly Productive Land** which 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. As stated earlier,

quarrying is part of the definition of Primary Production in the National Planning Standards and, 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 Rural Lifestyle chapter of the combined plan that needs to take into consideration the introduction of the HPL.

The **NPS Indigenous Biodiversity** is due for release shortly.

Consistent with the NPS Freshwater and Highly Productive Land, 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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