

# Submission from the AQA on the New Plymouth Draft Future Development Strategy

April 2024

## Introduction

1. The Aggregate and Quarry Association (AQA) is the industry body representing quarrying companies which produce 45 million tonnes of aggregate and quarried materials consumed in New Zealand each year.
2. We would like to thank the Taranaki Regional Council and New Plymouth District Council for the opportunity to comment on the [New Plymouth Draft Future Development Strategy \(FDS\)](#).
3. The purpose of the Future Development Strategy is to set out the strategic framework for providing for urban growth to meet the needs of New Plymouth district.
4. The Aggregate and Quarry Association is interested in the strategy because of the need to protect aggregate and other quarry materials from future development and to highlight its role in that development.

## Key points

5. To provide the district with sufficient housing and business development capacity over the next 30 years, which is a goal of the strategy, provision must be made to recognise existing and potential aggregate and sand deposits and provide for their extraction.
6. The strategy is well focused on protecting highly productive soils for agriculture. Aggregate deposits can only be sourced from where they are physically located and land containing them is also highly productive so should be protected also.
7. Policies which limit access to aggregates will necessitate making provisions to access them from further away / outside the sub-region which means higher costs for ratepayers and users of quarried materials, increased traffic congestion and increased carbon emissions.
8. We recommend that the FDS revisit the policies around highly productive land after planned changes to the NPS-HPL have been announced by the Government.

## Aggregates and New Plymouth district

9. Aggregate (crushed rock, gravel and sand) is an essential resource for the construction of housing, roading projects and other transport infrastructure. It is used for general construction – in concrete, asphalt, mortar and other building products.
10. It is also important for increasing resilience and adapting to extreme weather events and climate change.
11. Due to unprecedented levels of construction and infrastructure development activity, there is a growing demand for aggregate.
12. New Plymouth District in particular, is a fast-growing district where aggregate is needed to support infrastructure, housing and other construction activity.
13. The population projections on page 6 show that on average an additional 368 houses per year will be needed over the next 30 years. This equates to approximately 92,000 additional tonnes of aggregates and sand per year on top of that needed for relevant infrastructure to support the increase in housing.

## Protect access to potential aggregate resources

14. There is insufficient mention made of the importance of protecting mineral resources from future development, at least as it relates to aggregates. The role and contribution of aggregate and quarrying in terms of growth in the district, existing or potential, is also overlooked.
15. In thinking about the future of the sub-region It is important to be aware that aggregate deposits are 'location specific'. They can only be sourced from where they are physically located and where the industry is able to access them.
16. It is therefore important that the New Plymouth district does not shut off access to potential aggregate and sand deposits. Council planning must identify where the rock is located and protect those areas from other development and alternative land uses so that access to such resources is not lost.
17. The AQA would be happy to talk to the Taranaki Regional Council and New Plymouth District Council about what we know about where potential resources lie and work being done on this.
18. Due to its weight and volume, aggregate is very expensive to transport. An additional 30kms of 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.

## Reverse sensitivity

19. The aforementioned issues means that ultimately quarries should be close to residential and other areas where the aggregate is likely to be needed, but not too close to cause problems for either the quarry or the residential area and associated

activities.

20. We are pleased the document recognises the importance of reverse sensitivity as it relates to quarrying. On page 28 it says: “New residential and business land uses must not compromise the operation of lawfully established primary production activities (including quarrying) which generate effects such as dust, odour, traffic and noise”. This is important for residents and businesses who do not want to be impacted by quarries and also the quarries who don't want to be in that position.
21. The document also says (on page 30) that “There are likely to be no issues with reverse sensitivity in the areas within the Urban Intensification Focus scenario because they are already zoned for residential activities and there are no energy activities, quarries, pig and poultry farms present.” This is positive but we ask the council to consider this in light of where future quarries might be and to avoid creating subdivisions upon, or too close, to potential quarry areas. The same applies to the Greenfield Focus and Balanced Focus scenarios.

### **Highly Productive Land**

22. The FDS incorporates the National Policy Statement for Highly Productive Land (NPS-HPL) which has significant implications for the quarrying sector.
23. The NPS-HPL places a significant focus on land-based agriculture and reliance on use of the soil. New Plymouth district has significant areas of highly productive land (Land Use Capability classes 1-3).
24. It needs to be noted that land containing quarry materials is also highly productive. In fact, it is significantly more productive than soils used for agriculture due to the value and scarcity of the aggregates produced relative to the value of agricultural commodities.
25. Like highly productive soils, aggregate deposits can only be sourced from where they are physically located and where the industry is able to access them. It will be important that potential quarry land is not sterilised by the NPS-HPL. Appendix 1 shows the current quarries in New Plymouth impacted by LUC 1, 2 or 3 land.
26. The FDS says land classed as LUC 1, 2 or 3 is not deemed highly productive where it is already zoned General Residential Zone but it does present an obstacle for developing areas within the Greenfield Focus scenario.
27. We understand the future of the NPS-HPL is highly uncertain under the new Government.
28. We recommend that the Future Development Strategy revisit the policies around highly productive land after planned changes to the NPS-HPL have been announced by the Government.

### **Conclusion**

29. To future proof the sub-region and minimise the risk of future shortages of quarry materials, the strategy needs to protect aggregate resources from future

development. Failure to do so will mean it will have to be sourced, at some expense, from outside the sub-region.

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### Appendix – Highly productive land and active quarry overlay

