

Submission from the AQA on the Palmerston North Draft Future Development Strategy

May 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 Palmerston North District Council and Horizons Regional Council for the opportunity to comment on the [Palmerston North Draft Future Development Strategy \(FDS\)](#).
3. The purpose of the FDS is to set out the strategic framework for providing for urban growth to meet the needs of Palmerston North.
4. The Aggregate and Quarry Association is interested in the strategy because of the need to protect aggregate and other quarry materials from competing land use and future development of the district, and to highlight its role in that development.

Key points

5. We are concerned about the lack of mention of sand and aggregates in the draft FDS.
6. The FDS needs to be clear that continued access to sand and aggregates will be planned for, and access will not be impeded by future development and alternative land uses.
7. Council planning must identify where rock is located and protect those areas from other development and alternative land uses so that access to such resources is not lost.

Aggregates and Palmerston North

8. 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.
9. It is also important for increasing resilience and adapting to extreme weather events and climate change.
10. Due to unprecedented levels of construction and infrastructure development

activity, there is a growing demand for aggregate.

11. Palmerston North in particular, is a fast-growing district where aggregate is needed to support infrastructure, housing and other construction activity.
12. The housing demand projections on page 105 show that on average an additional 368 houses per year will be needed over the next 30 years¹. This equates to approximately 103,000 additional tonnes of aggregates and sand per year on top of that needed for relevant infrastructure to support the increase in housing.
13. There are also significant roading developments occurring which will be a drain on local quarries including the Manawatū Tararua Highway project which is having a significant impact on the region's aggregate resources.
14. The current and future capital projects listed on page 13 and elsewhere in the document all use aggregate and sand to varying degrees and will put pressure on existing sources over the coming years.

Protect access to potential aggregate resources

15. For these reasons, we consider the lack of any real mention of sand and aggregates in the draft FDS to be a concern.
16. We believe there needs to be an acknowledgement of the role and contribution of aggregate and quarrying in Palmerston North's future development and, in particular, the FDS needs to be clear that continued access to sand and aggregates will be planned for, and access will not be impeded by future development and alternative land uses such as housing.
17. The AQA would be happy to talk to the councils about what is known about where potential resources lie and work being done at the national level on this.
18. It is also 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.
19. The councils need to be cognisant of this in the context of the greenfield growth areas and business and industrial growth areas shown in the map on page 23 and elsewhere.
20. Council planning must identify where the rock is located and protect those areas from new development and alternative land uses so that access to such resources is not lost.
21. 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

¹ Based on the provided figure of 9,884 homes needed over the next 30 years and the rule of thumb of 280 tonnes of sand and aggregate per house.

is very expensive and would increase the cost of many of the proposed projects.

22. The aforementioned characteristics of aggregate deposits mean that 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 in terms of reverse sensitivity issues.

Highly Productive Land

23. The draft FDS incorporates the National Policy Statement for Highly Productive Land (NPS-HPL) which has significant implications for the quarrying sector.
24. The NPS-HPL places a significant focus on land-based agriculture and reliance on use of the soil. As stated in the draft FDS, Palmerston North has significant areas of highly productive land (Land Use Capability classes 1-3).
25. 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.
26. 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.
27. Map 35 on page 87 shows the areas of highly productive land in the district. We have attached a map of existing quarries against a highly productive land overlay.
28. The draft FDS identifies future greenfield growth areas that contain highly productive land and areas have long been signalled for future growth to meet housing and business demand. There is merit in doing the same for quarrying land
29. We agree the future of the NPS-HPL is highly uncertain under the coalition government and we are pleased that the FDS will revisit this after planned changes to the NPS-HPL have been announced.

Increasing resilience

30. Aggregates will play a major role in increasing Palmerston North's resilience and adapting to extreme weather events and climate change.
31. River flooding is already an issue in the district with the Manawatū River and its tributaries as a key feature of our environment and aggregates will be needed for stop banks and other flood protection structures as set out from page 78 of the draft FDS.

Conclusion

32. To future proof the district 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 - Manawatū

