

Submission from the AQA on the Dunedin Future Development Strategy

February 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 Dunedin City Council and Otago Regional Council for the opportunity to comment on the [Dunedin Future Development Strategy \(the FDS\)](#).
3. The FDS is a requirement of the Government's National Policy Statement on Urban Development (NPS-UD). It will replace the current Dunedin Spatial Plan, which was completed in 2012.
4. It is an important initiative that provides a framework to manage growth and development in Dunedin. The Aggregate and Quarry Association is interested in the strategy because of the need to protect aggregate and other quarry materials from future development.

Key points

5. To future proof Dunedin and minimise the risk of future shortages of quarry materials, the strategy needs to protect aggregate resources from future development and undue protections for other purposes. Failure to do so will mean aggregate will have to be sourced, at some expense, from outside the area.
6. 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.

Aggregates and Dunedin

7. The role and contribution of aggregate in the growth of Dunedin is overlooked in the FDS.
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. As outlined in the document, Dunedin's population growth is higher than anticipated and aggregate will be needed to support infrastructure and other construction activity associated with that growth. As well as increasing demand for existing aggregate resources, residential growth risks sterilising potential resources as residential areas expand.
11. It will be important that the FDS enables supply to meet the growing demand for aggregate.

Protect access to potential aggregate resources

12. 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.
13. It is therefore important that Dunedin does not shut off access to the potential aggregate resources in the area. Council planning must identify where the rock is located and protect those areas from other development and alternative land uses.
14. The FDS presents a number of risks to this in the protections it proposes for highly protective land, protected environmental values and potential rezoning among other things, as well as the risk of new housing areas sterilising aggregate resource.
15. Even without increased protections there is a risk of shortage. The Dunedin Business Land Research Report June 2023, which is one of the reports the DFS draws on, has this quote: "Dunedin's existing rock and gravel quarries could be exhausted in the short to medium term, meaning additional quarries may need to be identified and developed." But this sentiment does not seem to have been translated into the thinking around Development Capacity specifically or the DFS more generally.
16. 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 far from where it is to be used is very expensive and would increase the cost of many projects.

Highly Productive Land

17. The FDS incorporates the National Policy Statement for Highly Productive Land (NPS-HPL) which has significant implications for the quarrying sector.
18. The NPS-HPL places a significant focus on land-based agriculture and reliance on use of the soil. Dunedin has large areas of highly productive land (Land Use Capability classes 1-3) as shown in Figure 18 on page 55.
19. 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.

20. 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.
21. The FDS predicts land designated highly productive is unlikely to be needed for new housing. But it also says that some industrial designations sitting on highly productive land will need to be reassessed and may be rezoned.
22. As outlined earlier in relation to residential land, it will be important that potential quarry land is not sterilised by this.
23. We understand the future of the NPS-HPL is highly uncertain under the new Government.
24. 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

25. To future proof Dunedin and minimise the risk of future shortages of quarry materials, the strategy needs to protect aggregate resources from future development and undue protections for other purposes. Failure to do so will mean aggregate will have to be sourced, at some expense, from outside the area.

Wayne Scott

Chief Executive Officer

[Aggregate and Quarry Association](#)

wayne@aga.org.nz

021 944 336