

Submission from the AQA on the Proposed Wairarapa Combined District Plan

December 2023

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. 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.
3. We would like to thank the three Wairarapa district councils for the opportunity to comment on the [Proposed Wairarapa Combined District Plan](#) (the Proposed Plan). Our submission is limited to issues impacting on quarrying.
4. We support the idea of a combined plan for the three Wairarapa councils. This makes sense given the size of the councils and the desirability of consistency for businesses operating across the Wairarapa.

Key points of our submission

- The plan needs to reflect a shift from river-based gravel extraction to land-based quarrying which is a likely trend in the Wairarapa.
- Specifically, this needs to be reflected in GRUZ-R12 (2) and MPZ-R15 (2) which currently discriminate against land-based quarrying where processing activities usually occur on site.
- Council planning must identify where rock and aggregate is located and protect those areas from other development and alternative land uses.
- Land containing quarry materials is more productive than soils used for agriculture because of the value and scarcity of the aggregate produced.
- We recommend that the councils revisit references to highly productive land after planned changes to the National Policy Statement for Highly Productive Land 2022 have been made by the new Government.

General comment on aggregates and Wairarapa

5. 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.
6. Aggregate is also important for increasing resilience and adapting to extreme

weather events and climate change.

7. Due to unprecedented levels of construction and infrastructure development activity in the Wairarapa and New Zealand generally, there is growing demand for aggregate which is in short supply.
8. Aggregate deposits are 'location specific' – limited in quantity, location and availability. They can only be sourced from where they are physically located and where the industry is able to access them.
9. It is therefore important that the 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.
10. 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.

Aggregate and the Wairarapa

11. In the Wairarapa aggregate supply is mostly sourced from rivers not from land-based sources.
12. 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.
13. In addition to this, increasing development for building and infrastructure in the coming years is putting increased pressure on this aggregate supply generally.
14. There are aspects of the Proposed Plan that need to be amended to reflect the need for this new focus.

Specific comments on the Proposed Plan

Rural Environment objectives

15. Given quarrying's importance we don't think the Proposed Plan is sufficiently supportive of it. This could be remedied by a new or amended objective in the Rural Environment chapter.
16. It could be argued that RE-O2 and RE-O3 and other objectives in this chapter should be referring to quarrying but references elsewhere in the proposed plan suggest this is not the intention.
17. While the provisions in GRUZ-P5 (b) are reasonable when read individually, as an overall package they fail to project a positive impression of quarrying.

River-based gravel extraction and land-based quarrying

18. GRUZ-R12 (2) and MPZ-R15 (2) seem to be written for river extraction and not land-based quarries.
19. GRUZ-R12(2)(c) and MPZ-R15(2)(c) refer to quarrying sites where there is no processing (including crushing, screening, washing, and blending). With river extraction it is common for gravel to be transported away from the extraction area to be processed elsewhere. This is not the case with land-based quarrying where processing occurs at the same site. This provision will prove a barrier to land-based quarrying as it becomes more necessary in the Wairarapa (as discussed above in paragraphs 11-14).
20. It is also inconsistent with the definition of quarrying and quarrying activities in the Proposed Plan, as well as the National Planning Standards. These nationally consistent definitions include ancillary activities associated with extraction including processing. Other instruments and court decisions also recognise processing as an ancillary activity with a functional and operational need to be located where the extraction occurs. We recognise in the case of river extraction this collocation may not be appropriate.
21. This needs to be remedied to avoid uncertainty and to allow land-based quarrying, particularly as the Wairarapa is likely to move towards land-based quarrying as discussed.

Highly productive land

22. The Proposed Plan is (understandably) protective of agriculture, viticulture and rural lifestyle land but quarrying, which is often located in rural areas, is neglected and in fact disadvantaged by the protections provided to these industries.
23. The Proposed Plan uses the National Planning Standards for “primary production”, which we fully support. This definition incorporates quarrying as a primary industry, as it should. However, references to primary production in the Proposed Plan exclude quarrying and support for primary production does not extend to quarrying.
24. The definition of “highly productive land”, is not taken from the National Planning Standards. Instead, it has the same meaning as in the National Policy Statement for Highly Productive Land 2022 (NPS-HPL). The NPS-HPL places a significant focus on land-based agriculture and reliance on use of the soil.
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 because of 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. The original intent of the NPS-HPL was to protect highly productive land for future primary production. This would include quarrying, recognising that other factors in addition to soil determine the productive capacity of land.

27. We recommend that the councils revisit this after planned changes to the NPS-HPL have been made by the new Government.

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