

Submission from the AQA to Upper Hutt City Council on Proposed Plan Change 50

November 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 Upper Hutt City Council for the opportunity to comment on the proposed [Plan Change 50 Rural Review](#) (the proposed plan change).

Key points

4. Our submission makes the following key points:
 - Wellington is short of aggregates and so the Upper Hutt District Plan needs to allow for quarrying.
 - Like highly productive soils, aggregate deposits are 'location specific' and because of the value of these deposits land containing them is highly productive.
 - Plan Change 50, specifically the Rural Production Zone needs to recognise the highly productive, location-specific nature of land containing aggregate resources.
5. And makes the following specific recommendations:

Provision	Recommendation
RPROZ-P7 - Quarrying Activities Avoid quarrying activities or cleanfill areas to prevent the loss of productive capacity of highly productive land.	Oppose This policy should be deleted for the reasons set out in paragraphs 25-32 of this submission.

<p>RPROZ-R26 – Quarrying Activities</p> <p>“Non-complying” status.</p>	<p>Oppose</p> <p>This “Non-complying” status should be changed to “Discretionary” for the reasons set out in paragraphs 33-36 of this submission.</p>
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The importance of aggregates

6. 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.
7. Aggregate is also important for increasing resilience and adapting to extreme weather events and climate change.
8. Not only is there high demand for aggregate, supply is also constrained. 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.

Upper Hutt and aggregate supply

9. Even though there is currently no significant quarrying activity in Upper Hutt city, it is important that future potential activity is accommodated in the council’s planning.
10. Wellington region’s aggregate supply is seriously constrained, particularly south of the Remutakas, a lot of the potential rock resource has been built upon over many decades or is difficult to access. The development of Upper Hutt will potentially put more pressure on access to prospective quarrying land.
11. Current production is insufficient to meet the growing demand for aggregate in the wider region as the population and economy grow including for many public infrastructure projects.
12. Currently quarry products are brought into Upper Hutt from other parts of the region and beyond, and the distances transported can be quite large adding significant costs to the product. As a rule of thumb, an additional 30km travel typically doubles the cost of aggregate.
13. Much of Wellington’s available rock seam south of the Remutakas runs along the fault line adjacent to State Highway 2. There may be parts of this seam and other areas of Upper Hutt with aggregate potential where it becomes economic for the resource to be accessed.
14. It is important that the council takes steps to ascertain where such aggregate and mineral resources lie and ensure the district planning process does not preclude current and future access to them through encroachment of non-compatible land uses.
15. AQA is working with central government to increase knowledge of the location of mineral resources in New Zealand. Based on our existing knowledge, it is quite likely

that significant commercially viable resource lies within Upper Hutt. We attached as an appendix a map of the aggregate potential in the Wellington region which might be of some assistance in this regard.

16. Not doing this planning could mean lost opportunities for accessing a supply of quarried materials. For these reasons, it is essential that PC50, allows for future needs by not closing down access to potential quarrying land.

Highly Productive Land and the Rural Productive Zone

17. Upper Hutt District Plan Change 50 has taken into consideration the National Policy Statement for Highly Productive Land (NPS-HPL). Upper Hutt has highly productive land falling under classes 2 and 3 of the Land Use Capability assessment. This land generally is to be zoned Rural Production.
18. In this section and the next, we argue that land containing aggregate deposits is also highly productive and the District Plan should allow for this too.
19. Like highly productive soils, 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.
20. Land containing quarry materials is also significantly more productive than highly productive soils used for agriculture because of the value and scarcity of the aggregate deposits relative to the value of agricultural commodities.
21. We acknowledge that the National Policy Statement for Highly Productive Land places a significant focus on land-based agriculture and reliance on use of the soil. 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.
22. It should also be noted that quarrying is a temporary land use. At the end of its life the site is returned to its original purpose or a new activity. Farmland is often returned in a better state than it was prior to the aggregate extraction.
23. With the national policy statements likely to be reviewed as part of the new government's reform of resource management law and with the current government consultation under way in the form of the document, [Potential amendments to the National Policy Statement on Highly Productive land \(NPS-HPL\)](#), we recommend that the council amend the policy and objectives around the Rural Productive Zone as discussed in the next section .

Specific comments on the Plan change

24. Based on the comments above we make the following specific comments on the proposed plan change.

RPROZ-P7 – Avoid quarrying activities or cleanfill areas to prevent the loss of productive capacity of highly productive land.

25. We oppose this policy. There should be an easier consenting pathway for quarries to be located in the rural production zone.

Location Specific

26. As stated, quarrying is a location specific activity. It can and does only occur where the aggregate resource is located.

Highly Productive

27. Land containing aggregate resource is highly productive land. It is the highest-value use of productive land in terms of the annual return earned from it – generally more productive than land used for agriculture. Quarrying, therefore, is a productive use of that land and so shouldn't be seen as causing a "loss of productive capacity". Also as noted above, quarrying is a temporary land use and is often returned to its original use in a better state than it was prior to the aggregate extraction.

Primary Production

28. We refer to the Objectives of the Rural Production Zone. **RPROZ-O1** – Purpose of the Rural production zone – highly productive land is available for primary production activities.

29. Not only is quarrying land highly productive land, as described above, quarrying, by definition, is also a primary production activity.

30. Quarrying activities come under the definition of Primary Production in both the National Planning Standards and the definition as listed in the Upper Hutt District Plan ie:

"... any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities;"

Quarries and Infrastructure

31. We can also make a case based on **RPROZ-O2** – Infrastructure – Appropriate infrastructure is provided to support existing and planned activities meeting the needs of the rural community.

32. Aggregate is recognised as a key input into the infrastructure supply chain. The Infrastructure Commission supports this and says "with a growing pipeline of major projects on the horizon we need to protect the availability of our best resources for generations to come."¹

¹ [Infrastructure resources study](#)

RPROZ-R26 Quarrying activities – Non-complying.

33. We oppose this non-complying activity status and argue quarrying activities should instead be a discretionary activity in the Rural Production Zone.
34. Quarrying activities are as suited to being discretionary as much as the other activities listed in RPROZ R15-R27, if not more so. Many of these activities do not have any need to be situated on highly productive land ie they are not locationally constrained the way that quarrying activities are.

Rural Industry

35. “Rural Industries” (RPROZ-R16) is one of the few activities listed that should definitely be on the list. But we would argue that the definition of Rural Industries includes quarrying activities, furthering the case for its inclusion. This is because rural industry, as defined by the National Planning Standards means *“an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production.”*
36. “Primary Production” as stated above is defined in the National Planning Standards and the Upper Hutt District Plan definitions to include quarrying activities.

Table of recommendations

Provision	Recommendation
<p>RPROZ-P7 – Quarrying Activities</p> <p>Avoid quarrying activities or cleanfill areas to prevent the loss of productive capacity of highly productive land.</p>	<p>Oppose</p> <p>This policy should be deleted for the reasons set out in paragraphs 25-32 of this submission.</p>
<p>RPROZ-R26 – Quarrying Activities</p> <p>“Non-complying” status.</p>	<p>Oppose</p> <p>“Non-complying” status. This should become “Discretionary” for the reasons set out in paragraphs 33-36 of this submission.</p>

Wayne Scott
Chief Executive Officer
[Aggregate and Quarry Association](http://www.aggregateandquarry.org.nz)
wayne@aqa.org.nz
 021 944 336

Appendix

