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Civil Contractors New Zealand submission to Upper Hutt City Council on Proposed Plan Change 50

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1. Introduction

- 1.1 Civil Contractors New Zealand (CCNZ) is the national industry body for horizontal construction, representing more than 500 companies responsible for the physical construction and maintenance of New Zealand's infrastructure networks, including roading, water, public spaces, seawalls, rail networks, forestry roads, wind farms and much more.
- 1.2 Funded by its members, CCNZ works to increase understanding of the needs of civil construction companies to New Zealanders, improve industry practices and users' technical knowledge, and assist in developing a highly skilled workforce within a safe and sustainable work environment.
- 1.3 In addition to national representation, CCNZ also has 12 regional branches, including a Wellington Wairarapa Branch.
- 1.4 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).
- 1.5 We note the submission made on Proposed Plan Change 50 by the Aggregate and Quarry Association, and consider this submission has considerable merit.
- 1.6 We would like to further discuss the issues raised in this submission with Council.

2. Key Points

Our submission makes the following key points:

- 2.1 CCNZ supports the submission made by the Aggregate and Quarry Association (AQA)
- 2.2 Earthmoving is an essential activity for members, and the lack of nearby enabling infrastructure such as cleanfill or aggregate sites massively escalates project costs



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and increases wear and tear on the transport network. In order to increase project efficiency, reduce costs, and decrease carbon emissions and wear and tear on the network, the Upper Hutt District Plan needs to allow for cleanfill sites.

- 2.3 Over the past year, Wellington Wairarapa members have highlighted that the lack of quarry and cleanfill sites has significantly escalated project cost and reduced project efficiency. The lack of regional cleanfill sites has been named as the single biggest challenge the industry faces in constructing and maintaining the region's infrastructure.
- 2.4 We request the council recognise the importance of cleanfill in relation to infrastructure construction and maintenance, and the impact the proposed plan change may have on the region's ability to work.
- 2.5 A lack of local aggregate has also been brought to our attention by local members in the CCNZ Wellington Wairarapa Branch. The lack of local sites increases project cost by increasing the cost of cartage and material storage.
- 2.6 Like highly productive soils, aggregate deposits are 'location specific' and because of the value of these deposits land containing them is highly productive.
- 2.7 It is important these sites are within a reasonable proximity to the projects they service, to increase project efficiency. For example, if a truck driver has to drive more than 100kms to drop off a load of cleanfill, they will not be able to take more than two loads in a day, greatly increasing construction time and reducing efficiency.
- 2.8 A [recent study](#) by Te Waihanga New Zealand Infrastructure Commission maps available aggregate sites, several of which are within Upper Hutt City Council boundaries.
- 2.9 Plan Change 50, specifically the Rural Production Zone needs to recognise the highly productive, location-specific nature of land containing aggregate resources.

3. Specific recommendations

Our submission makes the following specific recommendations:

Plan provision	CCNZ 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>It is important 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>This “Non-complying” status should be changed to “Discretionary” for the reasons set out in paragraphs 33-36 of this submission.</p>

4. The Importance of Cleanfill

Cleanfill is clean (not contaminated) soil removed during earthmoving activities. While it can be reused, it does not have adequate structural properties to be used for building foundations, and it requires good sediment control to stabilise.

Across the Greater Wellington region, civil contractors move upwards of 1,000,000 cubic metres of cleanfill each year from slips, construction projects and other infrastructure construction activities (enough to fill Sky Stadium).

The Greater Wellington region is currently experiencing a major shortage of available cleanfill disposal sites, with a single significant site left in Wellington near the Southern Landfill. This is greatly escalating project costs.

Upper Hutt City Council should explore appropriate sites for cleanfill disposal and enable these, the alternative being that the region's ability to construct infrastructure will be significantly hampered, impacting council projects, local businesses and regional development, as well as private developers.

5. Conclusion

Thank you for the opportunity to make this submission. We consider this to be a matter of importance, not just for civil contractors, but for the future development of the region, and we would be happy to provide any further information if required.

We would also be happy to appear in person to support this submission and further discuss the impacts this proposed plan change may have on the region's civil contractors, and their ability to construct and maintain civil infrastructure.

Kind regards,

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