

**Stephen Davis**

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**From:** Jeremy Harding <jeremy@straterra.co.nz>  
**Sent:** Wednesday, 2 April 2025 4:36 PM  
**To:** District Plan Review Team  
**Subject:** [EXTERNAL] Submission AQA - Proposed Lower Hutt District Plan  
**Attachments:** Submission AQA - Hutt City Proposed Plan.pdf

**Categories:** Steve

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1. This is a submission from the Aggregate and Quarry Association (AQA) on the Proposed Lower Hutt District Plan 2025.
2. We could not gain an advantage in trade competition through this submission.
3. We are not directly affected by an effect of the subject matter of the submission that:
  - a. Adversely affects the environment, and
  - b. Does not relate to trade competition or the effects of trade competition.
4. We do not wish to be heard in support of our submission.
5. If others make a similar submission, we will consider presenting a joint case with them at the hearing.

Thanks  
Jeremy Harding

# Submission from the AQA on the Proposed Lower Hutt District Plan

April 2025

## Introduction

1. The Aggregate and Quarry Association (AQA) is the industry body representing quarrying companies which produce 48 million tonnes of aggregate and quarried materials consumed in New Zealand each year.
2. We would like to thank the Hutt City Council for the opportunity to comment on the [Proposed Lower Hutt District Plan](#). Our submission is limited to issues impacting on quarrying.
3. The Aggregate and Quarry Association is interested in the proposed plan because of the need to protect aggregate and other quarry materials from competing land use and future development of the city, and to highlight its role in that development.

## General comment on aggregates

4. As stated in the proposed plan, aggregate (crushed rock, gravel and sand) is an essential resource for the construction of roads, concrete, manufactured concrete building materials, asphalt and other products.
5. It is also important for increasing resilience and adapting to extreme weather events and climate change.
6. Due to increasing levels of construction and infrastructure development activity, there is a growing demand for aggregate across the country as well as in the Wellington region and Hutt City specifically.
7. We welcome the recognition in **QUARZ-P3** of the proposed plan of the importance of aggregates. Aggregate is a finite resource. It can only be sourced from where it is physically located and where the industry is able to economically access it. There are limited opportunities to establish new quarries because of the 'location specific' characteristic of aggregate deposits.
8. It should also be noted that due to its weight and volume, aggregate is very expensive to transport. An additional 30 km of travel typically doubles its cost. 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 projects. Quarries should ideally 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.

9. The AQA is a strong advocate for council planning across the country to identify where the rock and sand is located and to protect those areas from new development, and alternative land uses, so that access to such resources is not lost.

## Aggregates and the Wellington Region/Hutt City

10. The Wellington region and Hutt City are facing significant shortages of aggregate and sand due to a combination of supply constraints and high demand. Current production is insufficient to meet the expected demand over the coming years as infrastructure deficits and housing shortages are addressed.
11. We support a cooperative approach among councils in the region to address this shortage and to meet future needs and Hutt City has an important role to play in this.
12. A lot of the region's known rock deposits are located in the seam on the western hills of Hutt City and continuing south to Wellington City. This land has been built on over many decades, is difficult to access, or is (understandably) off limits due to the presence of parks and reserves.
13. As stated earlier, it is essential that the region's planning does not unreasonably curtail the expansion of existing quarries, or the establishment of new quarries.
14. Beyond the existing hard rock quarries the region's councils should allow for managed river gravel extraction, which we discuss later in the submission. They also need to provide for the importation of product from outside the Wellington Region, with coastal shipping potentially being a part of this.

## Comment on the plan

15. Compared with other New Zealand cities and districts we monitor; quarrying activity is well catered for in this proposed plan.

## Quarry Zone

16. We support the plan's use of a Quarry Zone and a dedicated Quarry Zone chapter (QUARZ) which clearly sets out the provisions for existing quarrying activities within existing quarry sites in Kelson and Haywards.
17. We broadly support the objectives, policies, rules and standards of the Quarry Zone chapter although we defer to the submissions of our member companies operating in the zones on the detail of these.
18. We support the use of a dedicated quarry chapter to set out the objectives, policies rules and standards relating to quarrying. And we support the clarification in the Earthworks Chapter, for example, which is clear that provisions in that chapter do not apply to quarrying.
19. However, given the region's shortage of aggregates, there is a need for more quarrying activity in Hutt City outside the existing quarry zone / quarry footprint.

20. The proposed plan allows for quarrying outside the quarrying zone in the General Rural Zone only.

### General Rural Zone

21. We support **GRUZ-P2 2 (e)** which lists “cleanfill and quarrying activities that support rural development” as potentially compatible activities in the General Rural Zone.
22. We support **GRUZ-R15** which provides a discretionary activity status for quarrying activities in the General Rural Zone.
23. The proposed plan could be clearer as to how these quarrying activities in the General Rural Zone (and any other zone) would be treated and what provisions would apply.

### Rural Lifestyle Zone

24. **RLZ-P3** lists quarrying activities as a potentially incompatible activity. We accept this is appropriate.

### Natural Open Space Zone

25. Based on its large geographic span and location in the western hills and elsewhere, there may be accessible aggregate deposits in the Natural Open Space Zone but there are no provisions for this in the proposed plan.
26. We believe the council should be open to providing quarrying in certain parts of this zone, under the appropriate conditions of course, if this turns out to be the case.

### The Quarry Zone Protection Overlay

27. We support the Quarry Zone Protection Overlay which is designed to address potential reverse sensitivity effects on quarrying activities within the Quarry Zone from new land use within rural areas near the Quarry Zone.
28. This overlay provides for the benefit and comfort of neighbouring residents and users of adjacent land as much as it prevents disruption to extractive operations.
29. The Quarry Zone Protection Overlay is listed in the definitions and is referenced in both the Rural Lifestyle Zone (RLZ) and General Rural Zone (GRUZ) chapters.
30. We support objectives **GRUZ-QZPO-O1** and **RLZ-QZPO-O1** that new activities and development in the General Rural and Rural Lifestyle Zones do not restrict quarrying activities in the Quarry Zone.

### Other quarry overlays

31. We note the proposed plan also provides for a **Quarrying Activity Overlay** and a **Quarry Amenity Protection Overlay**. These are listed in the definitions and appear on the map but do not seem to feature anywhere else in the proposed plan. I.e. there does not seem to be any provisions relating to these areas.

## River gravel

32. Extraction of aggregates will play a major role in increasing Hutt City's resilience and adapting to extreme weather events and climate change, particularly around the river. Aggregate material will be used for stock banks. Gravel extraction from rivers will be used for flood management and river realignment.
33. We argue the council should allow for more managed river gravel extraction. Not just for flood management but also to provide gravel to meet commercial need and alleviate the aforementioned shortages. River gravel can provide a source of sand where, as stated, there is an acute shortage in Wellington.
34. We acknowledge gravel extraction comes under the domain of the regional council but the council should acknowledge it and the plan should accommodate it where appropriate.
35. Managed gravel extraction would be of limited volumes, short-term takes and extraction in areas where gravel build-up creates a flood or erosion risk - or affects community infrastructure.

## Highly Productive Land

36. Objective **GRUZ-HPLO-O1** says land that is well-suited to "land-based primary production" should be protected from subdivision, land use and development that would constrain its use for land-based primary production.
37. We note the definition of land-based primary production specifically refers to production, from agricultural, pastoral, horticultural, or forestry activities, that rely on the soil resource of the land.
38. But we argue that that quarrying is also land-based primary production, and land containing aggregate deposits is also highly productive. In fact, it is significantly more productive than soils used for agriculture and horticulture due to the value and scarcity of the aggregates produced relative to the value of agricultural commodities.
39. Please note in making these comments we are not claiming the land identified in the Highly Productive Land Overlay contains aggregate resource or is not best suited for agricultural or pastoral uses. We are making a general comment about land designated highly productive.

**Wayne Scott**

**Chief Executive Officer**

[Aggregate and Quarry Association](#)

[wayne@aqa.org.nz](mailto:wayne@aqa.org.nz)