

# Further Submission for the Proposed District Plan

Clause 8 of Schedule 1, Resource Management Act 1991

## Privacy Statement

Your further submission must include your name, and an address for service (preferably email, but you can use a postal address). All information you include in this further submission, including your name and address for service, will be provided to other submitters and published on Hutt City Council's website. Paper copies may also be made available. Hutt City Council is required to collect and publish this information to carry out its functions under the Resource Management Act 1991 and to enable others to take part in the district plan process. The Council, other submitters, and the Environment Court may need to contact you during this process.

If your further submission does not include your name and an address for service, it will be rejected.

While the Council will retain all information provided in your further submission in secure council systems, all contact details will be removed from any documents published on Council's website once the district plan process is complete. However, your name and the contents of your further submission will still appear in these documents.

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at [contact@huttcity.govt.nz](mailto:contact@huttcity.govt.nz), call 04-570-6666, or write to us at Private Bag 31912, Lower Hutt 5040.

To: Chief Executive, Hutt City Council

**1. This is a further submission from:**

Full Name	<div style="border-bottom: 1px solid black; display: flex; justify-content: space-between; padding: 2px 5px;"> <span style="font-size: small;">Last</span> <span style="font-size: small;">First</span> </div>	
Company/Organisation	<div style="border-bottom: 1px solid black; height: 20px;"></div>	
Contact <i>if different</i>	<div style="border-bottom: 1px solid black; height: 20px;"></div>	
Address	<div style="border-bottom: 1px solid black; display: flex; justify-content: space-between; padding: 2px 5px;"> <span style="font-size: x-small;">Number</span> <span style="font-size: x-small;">Street</span> </div>	
	<div style="border-bottom: 1px solid black; padding: 2px 5px;"> <span style="font-size: x-small;">Suburb</span> </div>	
	<div style="border-bottom: 1px solid black; display: flex; justify-content: space-between; padding: 2px 5px;"> <span style="font-size: x-small;">City</span> <span style="font-size: x-small;">Postcode</span> </div>	
Address for Service <i>if different</i>	<div style="border-bottom: 1px solid black; padding: 2px 5px;"> <span style="font-size: x-small;">Postal Address</span> </div>	
Phone	<div style="border-bottom: 1px solid black; display: flex; justify-content: space-between; padding: 2px 5px;"> <span style="font-size: x-small;">Home</span> <span style="font-size: x-small;">Work</span> </div>	<div style="border-bottom: 1px solid black; height: 20px;"></div>
	<div style="border-bottom: 1px solid black; padding: 2px 5px;"> <span style="font-size: x-small;">Mobile</span> </div>	
Email	<div style="border-bottom: 1px solid black; height: 20px;"></div>	

2. This is a **further submission** in support of or opposition to a submission on the Proposed Lower Hutt District Plan.

3. I consider that, under Clause 8 of the First Schedule of the Resource Management Act, I may make a further submission because:

I represent a relevant aspect of the public interest

*Please give details:*

I have an interest in the Proposed Plan Change that is greater than the interest of the general public

*Please give details:*

I represent Hutt City Council

4. I support or oppose the submission of:

*Name and address of original submitter and submission number of original submission:*

*(Please use additional pages if you wish)*

5. The particular parts of the submission I support or oppose are:

*Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal*

*(Please use additional pages if you wish)*

6. The reasons for my support or opposition are:

*Please give reasons:*

*(Please use additional pages if you wish)*

7. I seek that the whole or part [*describe part*] of the submission be allowed or disallowed:

*Please give precise details:*

*(Please use additional pages if you wish)*

8. I  **wish**  **do not wish** to be heard in support of my submission

*(Please tick one)*

9. If others make a similar submission,

I  **will**  **will not** consider presenting a joint case with them at the hearing

*(Please tick one)*

Signature of submitter

*(or person authorised to sign on behalf of submitter)*

	<i>Date</i>
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A signature is not required if you make your submission by electronic means

FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO  
SUBMISSIONS ON:  
LOWER HUTT PROPOSED DISTRICT PLAN REVIEW (Form 6)

To:  
Hutt City Council  
Private Bag 31912,  
Lower Hutt 5040

Full name: Winstone Aggregates (a division of Fletcher Concrete and Infrastructure Ltd)  
Contact Person: Phil Heffernan  
Agent: Winstone Aggregates  
Email for service: Phil.heffernan@winstoneaggregates.co.nz  
Postal address for service: 810 Great South Road,  
Penrose, Auckland  
Phone: (+64) 021677733

This is a further submission in support of or opposition to a submission on the Proposed Lower Hutt District Plan.

Winstone Aggregates (a division of Fletcher Concrete and Infrastructure Ltd) (Winstone) is an organisation that has an interest in the Lower Hutt Proposed District Plan that is greater than the interest the general public because it operates a number of quarries in the Lower Hutt area.

Winstone wishes to be heard, and to call legal submissions and expert evidence, in support of their further submission.

If others make a similar further submission, Winstone may consider presenting a joint case at the hearing.

Winstone Aggregates makes the following further submission with regard to relief sought in submissions from others in the matter of the Lower Hutt Proposed District Plan 2025:

Further Submission Point ID	Submitter Name Address and Submitter ID	Plan Provision	Submission Point ID	Support/Oppose	Reasons	Decision Sought (Part or whole)
1	Wellington Regional Council ("Greater Wellington") Submitter ID 452	Definitions	7, 8, 9, 10	Oppose	Winstone considers that these definitions (as sought by GWRC) do not accurately reflect NPS-IB or best practice. These definitions are subject to appeal under PC1 to the Wellington RPS.	Relief sought be disallowed.
2	Wellington Regional Council ("Greater Wellington") Submitter ID 452	Offsetting and compensation	4, 5	Oppose	Winstone considers that by the policy wording from GWRC is inconsistent with the NPS-IB.	Relief sought be disallowed.
3	Greater Wellington Submitter ID 452	ECO-O1	107	Oppose	The objective as notified, and relief sought from GWRC, does not specify a meaningful scale at which 'no net loss' is to occur.	That "in Lower Hutt" is amended to provide a more meaningful scale such as a catchment scale.
4	Greater Wellington  Submitter ID 452	ECO-P3	112	Oppose	Winstone considers that by removing specific reference to the Natural Open Space Zone and the Residential Zone within this Policy, this widens the application of the Policy within all zones	Reference to the Natural Open Space Zone and Residential Zone is retained in ECO-P3

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					(including the Quarry Zone) to the provisions of the policy. This would adversely counteract the objectives of <i>special-purpose zones</i> , including but not limited to Quarry Zone, which is intentionally to provide for quarrying activities.	
5	Greater Wellington  Submitter ID 452	ECO-R2 (3)	118	Oppose	Winstone opposes the submission to delete ECO-R2 as doing so precedes the inclusion of the new rule addressed within submission point ID 119 below.	Retain ECO-R2.3, with the inclusion of changes proposed in the original submission #444.
6	Greater Wellington  Submitter ID 452	ECO-R2 (x)	119	Oppose	Winstone opposes the inclusion of the Quarry Zone within proposed Rule ECO-R2 (x), which would adversely counteract the stated objectives of the Quarry Zone within the Proposed District Plan. Furthermore, none of the permitted activity conditions listed provides for the clearance of indigenous vegetation associated with the operation and development of quarrying	Refrain from adding new rule ECO-R2 (x).

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					activities. This contradicts the intended purpose of the Quarry Zone, as operators would not be eligible for permitted activity status to undertake the development of quarrying activities within the Quarry Zone.	
7	Greater Wellington  Submitter ID 452	ECO-R2 (4)	120	Oppose	Winstone has appealed these definitions in the RPS-PC1 as the provisions to not accurately reflect the NPS-IB. Winstone opposes GWRC's proposed changes to ECO-R2(4). In addition to the proposed inclusion of ECO-R2 (x) as suggested above, this would mean that the development of quarrying activities within the quarry zone would become a discretionary activity. This would unnecessarily complicate the normal operations which are consistent with the objectives of the Quarry Zone.	Retain ECO-R2 (4) as it currently exists in the Proposed District Plan.
8	Greater Wellington	Maps	Pages 55,59,56,60	Oppose	Winstone has appealed these definitions in the RPS-PC1 as the provisions to not	Relief sought in further subs be disallowed.

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	Submitter ID 452				accurately reflect the NPS-IB and broaden the scope of protection. Winstone is of the opinion that the flood maps B4, B5, C4, and C5 should not apply to the Quarry Zone for the reasons set out in the original submission PDP/444.	
9	The Royal Forest and Bird Protection Society of New Zealand Incorporated ("FAB") Submitter ID 424	Definition – Rural Environment	7	Oppose	Winstone has appealed these definitions in the RPS-PC1 as the provisions to not accurately reflect the NPS-IB and broaden the scope of protection. Winstone considers the Quarry Zone should be excluded from the relief sought by FAB to list zones to which the definition of rural environment applies, as they are areas of primarily industrial activity and can be located within or near Urban environments or Rural environments.	Refrain from including the Quarry Zone within the definition of rural environment.
10	The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID 424	ECO-P1	36	Oppose		
11	Aggregate and Quarry Association ("AQA")	QUARZ-P3	7	Support	Winstone agrees with AQA with regard to the importance of aggregate, and the cost of haulage.	

Further Submission Point ID	Submitter Name Address and Submitter ID	Plan Provision	Submission Point ID	Support/Oppose	Reasons	Decision Sought (Part or whole)
	Submitter ID 202					
12	Aggregate and Quarry Association Submitter ID 202	QUARZ	16, 17	Support	Winstone agrees that the use of the Quarry Zone from the National Planning Standards is appropriate.	Retain quarry zoning in the PDP without changes.
13	Aggregate and Quarry Association Submitter ID 202	EW	18	Support	Winstone agrees that the PDP Earthworks Chapter (EW) should not apply to quarrying activities.	Retain EW chapters applicability to quarry zone as notified without changes.
14	Aggregate and Quarry Association Submitter ID 202	GRUZ-P2 2(e)	21	Support	Winstone agrees that quarrying activities in the rural zone are appropriate in some situations and this can be demonstrated through the consenting process.	Relief sought by AQA.
15	Aggregate and Quarry Association Submitter ID 202	GRUZ-R15	22	Support	Winstone agrees that quarrying activities in the rural zone are appropriate in some situations and this can be demonstrated through the consenting process.	Relief sought by AQA.
16	Aggregate and Quarry Association	RLZ-P3	24	Oppose in part	Winstone agrees that generally (at a district-wide scale) quarrying activities in	That the Quarry Zone Protection overlay be retained to the west

Further Submission Point ID	Submitter Name Address and Submitter ID	Plan Provision	Submission Point ID	Support/Oppose	Reasons	Decision Sought (Part or whole)
	Submitter ID 202				the Rural Lifestyle Zone (RLZ) may be inappropriate in some situations. However, the existing use rights of the Belmont Quarry should not be compromised by the RLZ to the west of Belmont Quarry (being 87B Kaitangata Crescent, 89 Kaitangata Crescent, 104 Kaitangata Crescent, 180 Kaitangata Crescent and 200 Liverton Road).	of the Belmont Quarry.
17	Aggregate and Quarry Association Submitter ID 202	NOSZ	25, 26	Oppose in part	Winstone agrees that quarrying activities in the western hills may be appropriate in some situations and this can be demonstrated through the Schedule 1 process.	That the relief sought in Submission 444 from Winstone Aggregates be given by the Panel, specifically with regard to the request to rezone land from NOSZ to QUARZ.
18	Aggregate and Quarry Association Submitter ID 202	Quarry Zone Protection Overlay	27-30	Support	Winstone agrees that the Quarry Zone Protection Overlay is essential to manage reverse sensitivity effects in the RLZ and GRZ to the west of the Belmont Quarry.	That the Quarry Zone Protection Overlay be retained to the west of the Belmont Quarry.

Further Submission Point ID	Submitter Name Address and Submitter ID	Plan Provision	Submission Point ID	Support/Oppose	Reasons	Decision Sought (Part or whole)
						<p>That the relief sought in Submission 444 from Winstone Aggregates be given by the Panel, specifically with regard to the request to rules:</p> <ul style="list-style-type: none"> <li>• GRUZ-QZPO-R1</li> <li>• GRUZ-QZPO-R2</li> <li>• GRUZ-QZPO-R3</li> <li>• RLZ-QZPO-R1</li> <li>• RLZ-QZPO-R2</li> <li>• RLZ-QZPO-R3</li> </ul>
19	Aggregate and Quarry Association Submitter ID 202	Quarry Zone Protection Overlay	31	Support	Winstone agrees that the planning map overlays and the district plan policies do not align in their use of terms.	That the relief sought in Submission 444 from Winstone Aggregates be given by the Panel, specifically with regard to 'Part 4 Maps', pages 19-20.

Further Submission Point ID	Submitter Name Address and Submitter ID	Plan Provision	Submission Point ID	Support/Oppose	Reasons	Decision Sought (Part or whole)
20	Aggregate and Quarry Association Submitter ID 202	Highly Productive Land	36-39	Support	Winstone agrees with the logic presented by AQA.	That land-based primary production be amended to include quarrying activities.
21	Horokiwi Quarries Limited ("HQL") Submitter ID 246	Earthworks Chapter (EW)	1	Support	Winstone agrees that the PDP EW should not apply to quarrying activities.	Retain EW chapters applicability to quarry zone as notified without changes.
22	Horokiwi Quarries Limited ("HQL") Submitter ID 246	Strategic Direction INFSD-07	7	Support	Winstone agrees with HQL with regard to the importance of recognising the benefits and providing for the utilisation of the city's mineral resources.	Support the inclusion of the proposed Strategic Direction Objective INFSD-07 as presented in Submission 246.
23	Horokiwi Quarries Limited ("HQL") Submitter ID 246	GRUZ-Rxx	31	Support (Conditional)	Winstones supports relief sought in PDP Submission 246 at [31] in so far as it does not relate to the quarry zone.	Do not expand the scope Rule GRUZ-Rxx to relate to the Quarry Zone.
24	The Director General (D-G) of Conservation ("DOC") Submitter ID PDP/405	ECO-P1 ECO-P2 ECO-P3 ECO-P4	Page 20, Row 5	Oppose	Winstone considers that the entire removal of ECO-P1 to ECO-P4 is not the most appropriate way to achieve Objective ECO-O1.	Relief sought by Winstone in PDP/444 is granted in preference of that in DOC submission PDP/405.
25	The Director General (D-G)	ECO-R2	Pages 21, 22	Oppose	Winstone considers that the application of ECO-R2 to the	Relief sought by DOC in submission

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	of Conservation ("DOC") Submitter ID PDP/405				Quarry Zone (QUARZ) is inappropriate.	PDP/405 is disallowed in the Quarry Zone (QUARZ).