

BEFORE THE HEARING PANELS

IN THE MATTER of the Resource Management
Act 1991(**RMA**)

AND

IN THE MATTER of Proposed District Plan for
Lower Hutt

& IN THE MATTER of Hearing Stream 1 (HS1)

SUBMITTER Winstone Aggregates

**STATEMENT OF COMPANY EVIDENCE OF PHILIP WAYNE HEFFERNAN ON
BEHALF OF WINSTONE AGGREGATES**

DATED: 23 APRIL 2026

1. SUMMARY OF EVIDENCE

- 1.1. This evidence is presented on behalf of Winstone Aggregates in relation to the Proposed Lower Hutt District Plan and Winstone's submission (444) and further submission (F33).
- 1.2. This evidence provides an overview of Winstone's operations in the Wellington region, with a particular focus on Belmont Quarry and its strategic importance in supplying aggregate for infrastructure and urban development.
- 1.3. A key theme of this evidence is the need for the Proposed District Plan to appropriately recognise and provide for quarrying activities, particularly where they relate to regionally significant mineral resources that are essential to achieving broader urban development, infrastructure, and climate resilience outcomes.
- 1.4. This evidence also highlights the importance of ensuring that planning provisions are workable and reflect the operational realities of quarrying, including the dynamic nature of quarry environments and the need for flexible, effects-based management approaches.
- 1.5. In addition, this evidence addresses the relationship between the Proposed District Plan and the Fast-Track application relating to Belmont Quarry, noting the importance of consistency and alignment between these processes.
- 1.6. This evidence also addresses plan-wide integration matters, including how district-wide provisions interact with the Special Purpose Quarry Zone and the implications of that for Belmont Quarry. As this is a plan-wide integration topic, it is being raised now in Hearing Stream, recognising that the finer detail of how plan integration between chapters is to be achieved is a matter better dealt with in subsequent hearing streams.

2. INTRODUCTION

- 2.1. My name is Philip Wayne Heffernan, and I am contracted as a Principal Planner and a Project Manager at Winstone Aggregates (**Winstone**). I have been fulfilling these roles since 2023.
- 2.2. I hold a Bachelor of Applied Science degree in Natural Resource Management from Massey University, and I am an Associate Member of the New Zealand Planning Institute and a member of the Resource Management Law Association.
- 2.3. With over 20 years of experience in resource management and planning in New Zealand, I have worked in both the public and private sectors, managing planning teams, overseeing projects, preparing resource consent applications, providing expert evidence at hearings and resource management and planning advice to a diverse range of clients.
- 2.4. Prior to my work with Winstone, I served as the Planning Manager and Principal Planner at Wood and Partners Consultants from 2015 to 2022. Previously, I held positions with at Babbage Consultants Limited, Jacobs (formerly Sinclair Knight Merz) and Auckland City Council.
- 2.5. In this instance, I am representing Winstone Aggregates and providing company evidence to support their submissions. I confirm I am authorised to give evidence on their behalf.
- 2.6. I confirm that I have complied with the Environment Court's Code of Conduct for expert witnesses, as stated in the Environment Court of New Zealand's Practice Note 2023. In preparing this evidence, I affirm that my expertise covers the matters discussed unless I explicitly rely on the evidence of others. Moreover, I confirm that I have considered all material facts known to me that may impact or detract from my stated opinions.

3. SCOPE OF EVIDENCE

- 3.1. The purpose of my evidence is to provide background to Winstone Aggregates and its operations in the Hutt City area, specifically Belmont Quarry.
- 3.2. This evidence provides context for Winstone's submission and further submissions on the Proposed District Plan, and outlines the importance of Belmont Quarry as a regionally significant resource.
- 3.3. It also addresses the relationship between the Proposed District Plan and the Belmont

Quarry Fast-Track application, and identifies key planning considerations relevant to quarrying activities within the District Plan framework.

- 3.4. This evidence also addresses plan-wide integration matters relevant to Hearing Stream 1, including how the structure and interaction of provisions within the Proposed District Plan may affect the operation of the Special Purpose Quarry Zone.
- 3.5. This evidence focuses on the broader strategic and operational context to provide a high-level introduction to Winstone's interests in the district plan review, rather than providing detailed technical matters, which will be addressed through separate expert evidence where required in subsequent hearing streams.

4. BACKGROUND

- 4.1. Winstone Aggregates, a division of Fletcher Concrete and Infrastructure, holds a prominent position in the aggregates industry in New Zealand. With a history spanning over a century, Winstone is the largest manufacturer and distributor of aggregates in the country.
- 4.2. Winstone operates numerous extraction sites across New Zealand, including several quarries in the Wellington region. These operations provide a local and reliable source of aggregate for construction, roading, and infrastructure projects.
- 4.3. The importance of aggregates to the Wellington region cannot be overstated. Aggregates are a fundamental input into construction and infrastructure, and are essential for enabling housing supply, transport infrastructure, and broader economic development. Aggregates also play an essential role in resilience and disaster recovery.
- 4.4. The availability of locally sourced aggregate is particularly important, as it reduces transportation costs and emissions, and ensures a secure and efficient supply of materials to meet district and regional demand, local Councils and infrastructure providers are key clients for the quarry.
- 4.5. Belmont Quarry is a strategically important aggregate resource within the Wellington region. It has supported the growth of Hutt City since the 1920s, with Winstone's involvement since 1988. It remains a key source of aggregate for the Wellington market, including a significant proportion of high-grade material.
- 4.6. The demand for aggregate in the region is driven by population growth and major infrastructure projects, including the Wellington Northern Corridor, Transmission Gully, and Riverlink. Belmont Quarry plays a key role in meeting this demand.

- 4.7. Belmont Quarry is a regionally significant physical resource. Its continued operation is critical to ensuring that the Wellington region can meet its infrastructure and development needs in a cost-effective and sustainable manner.
- 4.8. Quarrying activities are inherently tied to the location of the mineral resource. Unlike many other land uses, quarries cannot be relocated to more convenient or less constrained locations.
- 4.9. Belmont Quarry is a greywacke quarry and, like all quarries, is subject to continuous change as extraction progresses. The landform evolves over time through the creation of benches, faces, and rehabilitation areas.
- 4.10. This dynamic nature means that static, point-in-time assessments of environmental conditions can quickly become outdated or misaligned with actual site conditions.
- 4.11. In my view, this has important implications for planning. It supports the need for a more adaptive, effects-based approach, rather than reliance on rigid or static planning controls that do not reflect operational realities.
- 4.12. Belmont Quarry operates under a comprehensive regulatory framework, including regional consents and a Quarry Management Plan, required by the District Plan. This framework provides a structured and responsive approach to managing environmental effects and operational risks.
- 4.13. The Quarry Management Plan is a dynamic document that is regularly reviewed and updated to reflect current conditions and operational requirements. It addresses key matters such as slope stability, water management, erosion and sediment control, and rehabilitation.
- 4.14. Within the context of the Proposed District Plan, Belmont Quarry is identified through a Special Purpose Quarry Zone framework intended to recognise and provide for quarrying activities.
- 4.15. Winstone supports the intent of this approach, noting that a tailored planning framework is necessary to appropriately provide for quarrying activities while managing effects.
- 4.16. The quarry has operated well under the existing extraction zone framework in the operative plan and has an excellent compliance record.
- 4.17. Winstone understands the Council is required to update the structure of the plan in accordance with the National Planning Standards, and worked closely with the Council on the draft plan to update the Special Purpose Quarry Zone.

- 4.18. However, Winstone's submission and further submissions raise concerns where provisions may not appropriately recognise the functional needs of quarrying, extend controls beyond what is necessary to manage effects, or inadvertently undermine the purpose of the Special Purpose Quarry Zone.
- 4.19. In particular, there is a risk that provisions located outside of the Special Purpose Quarry Zone, including district-wide chapters such as noise, transport, and earthworks, may constrain existing quarrying activities if not appropriately integrated.
- 4.20. Quarrying underpins many of the outcomes sought through the District Plan, including urban development, infrastructure delivery, and climate resilience.
- 4.21. In my view, a failure to appropriately recognise and provide for quarrying activities risks undermining these broader outcomes.

The planning framework should therefore ensure that the strategic importance of Belmont Quarry is recognised, that quarrying activities are appropriately provided for, and that effects are managed in a practical and proportionate way that reflects the operational realities of quarrying.

5. BELMONT QUARRY FAST-TRACK APPLICATION

- 5.1. Belmont Quarry is also subject to a Fast-Track application, which reflects its ongoing and future importance as a regionally significant resource. This application seeks various approvals including a land exchange with Department of Conservation for land in Belmont Regional Park, and regional and district resource consents to develop a new overburden disposal area on land adjacent to the existing quarry and wildlife approvals.
- 5.2. The Fast-Track process recognises the Quarry's strategic importance in supporting regional infrastructure and development outcomes.
- 5.3. There is a clear relationship between the Fast-Track application and the Proposed District Plan. Both processes are addressing the future of the same resource, and are being progressed at the same time.
- 5.4. It is therefore important that the Proposed District Plan provisions are consistent with, and do not undermine, the outcomes being sought through the Fast-Track process. Winstone seeks, through various submission points, to ensure that the zoning of the Special Purpose Quarry Zone and the Natural Open Space Zone in the Proposed District Plan properly recognises the change in ownership and use of land that will follow in the event that the Fast-Track application is approved.

- 5.5. The Belmont Quarry Fast-Track application is currently being processed by the Department of Conservation as to the land exchange component of the application. A report from the Department is due to be released on 7 July 2026. After that, the substantive application for other approvals including resource consents will be lodged with the EPA, and Winstone anticipates a final decision in late 2026 or early 2027.
- 5.6. More broadly, the Proposed District Plan must strike an appropriate balance between environmental protection and the need to provide for regionally significant mineral resources.

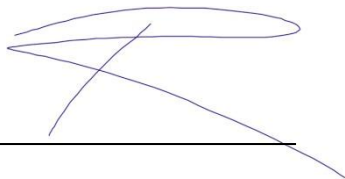
6. INTEGRATION AND HEARING STREAM 1 CONTEXT

- 6.1. The whole-of-plan matters being considered in Hearing Stream 1 are of particular importance to Winstone, as they relate to the overall structure of the Proposed District Plan and how different parts of the Plan are intended to operate together.
- 6.2. The way in which a plan is structured and applied in practice can have a significant influence on outcomes, often more so than the wording of individual provisions in isolation.
- 6.3. A key issue for Winstone is how the Special Purpose Quarry Zone interacts with district-wide provisions, including those relating to noise, transport, earthworks, and other effects-based controls, and the extent that introduction of new controls may impact on the long-established extraction activity at Belmont Quarry.
- 6.4. While the Special Purpose Quarry Zone is intended to recognise and provide for quarrying activities, there is a risk that district-wide provisions may, in practice, override or constrain those activities if the integration between these parts of the Plan is not clear and appropriately managed, often bespoke controls are needed for quarrying activities as they do not fit comfortably with more general rules aimed at land use.
- 6.5. This raises a fundamental integration issue. Quarrying is a resource-dependent activity that must locate where the mineral resource exists. In this case, there is a functional and operational need for Belmont Quarry to remain in place. As a result it is not possible to treat quarrying in the same way as other land uses that have flexibility in location.
- 6.6. The new planning framework should recognise this, and ensure that district-wide provisions are applied in a way that supports, rather than undermines, the intent of the Special Purpose Quarry Zone. This is not a matter of quarrying activities overriding other values, but rather ensuring that there is a balanced and integrated approach that appropriately reconciles competing considerations. The zoning framework in the

operative plan has done this well, without issue for decades.

- 6.7. If integration is not addressed clearly, there is a risk that the Special Purpose Quarry Zone will not function as intended, and that consent processes will become more complex, uncertain, and restrictive than anticipated.
- 6.8. In my view, it is important that the Proposed District Plan provides clear direction on how conflicts between provisions are to be resolved, and that it avoids a siloed approach where district-wide provisions are applied without appropriate regard to the purpose and intent of the Special Purpose Quarry Zone.
- 6.9. This is particularly relevant given the importance of Belmont Quarry as a regionally significant resource, and the need to ensure that it can continue to operate and develop to meet both the district and regional demand.
- 6.10. Accordingly, I support a planning approach that recognises the need for integrated management and that provides clarity on how different parts of the Plan are intended to work together in practice. Winstone look forward to traversing in finer detail that via evidence in later hearing streams.

Signature

A handwritten signature in blue ink, consisting of a large, stylized 'P' followed by a horizontal line and a diagonal stroke.

Phil Heffernan authorised to give evidence on behalf of
Winstone Aggregates.

Dated

23 April 2026

ATTACHMENT A QUALIFICATIONS AND EXPERIENCE OF PHIL HEFFERNAN

Career Summary	2023 - Now	Project Manager and Principal Planner Winstone Aggregates
	2022- Now	Director and Principal Planner 7Lab Limited
	2015 – 2022	Wood and Partners Consultants Ltd – Planning Manager and Principal Planner
	2014 – 2015	Babbage Consultants Limited - Planning Manager
	2012 – 2014	Jacobs – Auckland Environmental and Planning Team Leader
	2010 – 2012	Jacobs – Senior Planner
	2005 – 2010	Jacobs - (formally Sinclair Knight Merz) - Environmental Planner
	2004 – 2005	Auckland City - Regulatory Planner
Qualifications	Bachelor Applied Science – Natural Resource Management	
Affiliations	Associate New Zealand Planning Institute	
	Member Resource Management Law Association	