

3 June 2026

Hutt City Council Proposed District Plan
Hutt City Proposed District Plan Hearings Panel

Email: District.Plan@huttcity.govt.nz

Dear Sir/Madam

Hutt City Proposed District Plan: Hearing Stream 3 – Rural Zone

Hearing Statement for Horokiwi Quarries Limited (Submitter reference 246 and F05)

Horokiwi Quarries Limited (“Horokiwi”) writes in relation to Hearing Stream 3 – Rural Zone that is scheduled to commence on 22 June 2026.

There are a limited number (five original) of submission points of relevance to Horokiwi that are being considered as part of Hearing Stream 3. Of the five points, three relate to the General Rural Zone policies and two relate to General Rural Zone rules. Given the limited number and nature of points at issue, Horokiwi has not sought to be heard and has not filed evidence. That said, Horokiwi is available to respond to any questions the Hearings Panel may have.

Horokiwi Quarries Limited

As set out in Horokiwi’s original submission, the company has a long-established quarry activity located within Fitzroy Bay, which is partly located in the General Rural Zone (inland of the MHWS) and Coastal Marine Area. Material extracted from the site is transported to the Horokiwi Quarry site on Horokiwi Road, where it is processed for use in the concrete and building industries. There are no associated permanent structures or buildings, instead equipment is used on a temporary basis.

Resource consents are held for gravel extraction (quarrying) which authorise the extraction of 10,000 cubic metres of sand aggregate from the site per year. These consents expire mid 2027.

Quarrying and the Proposed District Plan

Quarrying activities outside the proposed Quarry Zone have a challenging role in the Proposed District Plan (PDP). Quarrying activities are location and resource dependent, resulting in functional

and operational needs. As set out in Horokiwi's submission, quarries are essential to enabling the city's growth and supporting the construction of key infrastructure (such as providing aggregate for cycleway and road construction, fill material for the repair and maintenance of three waters infrastructure), as well as essential construction material for new dwellings. Despite this, they are not recognised as 'Infrastructure' within the PDP.

However, the recently introduced National Policy Statement for Infrastructure (NPS-I) recognises quarrying activities as 'infrastructure supporting activities'¹. Policy 5 of the NPS-I contains specific direction for infrastructure supporting activities which I set out in full below.

Policy 5: Recognising and providing for infrastructure supporting activities

- (1) *Decision-makers must recognise and provide for the role of infrastructure supporting activities, including by:*
- (a) *recognising the importance of infrastructure supporting activities to enable the benefits of infrastructure activities to be realised;*
 - (b) *recognising the operational need or functional need of some infrastructure supporting activities, including supporting quarrying activities to operate in, be located in, or traverse particular environments and locations; and*
 - (c) *enabling the timely delivery of infrastructure supporting activities.*

In the notified PDP, the General Rural Zone provides some policy direction for existing quarries and has one specific quarry rule (GRUZ-R15) resulting in a Discretionary activity status. In terms of policies and rules, Horokiwi seeks relief for existing quarry sites, as described in the table attached to this hearing statement.

Response to Section 42A Report

Horokiwi generally supports the recommendations of the Section 42A Report where they retain the notified objectives and policies of relevance to its submission. In particular, Horokiwi supports the recommendation to retain Objectives GRUZ-O1 and GRUZ-O2 as notified, which appropriately recognise the role of the General Rural Zone and the importance of functional and operational need. These provisions provide an important foundation for recognising quarrying activities within the zone. Horokiwi also supports the recommendation to retain the list of potentially compatible activities in Policy GRUZ-P2(2).

However, Horokiwi does not support the Section 42A recommendations where they reject relief sought to better recognise the role and function of quarrying activities. In relation to Policy GRUZ-P2, Horokiwi maintains its position that the reference to "rural development" in clause 2(e) should be amended to "development", to reflect the reality that quarrying and cleanfill activities support a wide range of development outcomes across the district, including urban development and infrastructure. While the reporting officer acknowledges the importance of quarrying to

¹ Section 1.4 of the National Policy Statement for Infrastructure defines 'infrastructure supporting activities' as "activities that are not ancillary infrastructure activities but that are needed to directly support infrastructure activities, and may include quarrying activities".

development generally, the recommendation retains a narrow rural focus that does not appropriately reflect the functional role of these activities.

Horokiwi also does not support the rejection of the proposed new rule providing a restricted discretionary activity pathway for the consenting and modification of lawfully established quarrying activities outside the Quarry Zone. The concerns raised by the reporting officer relate primarily to the scope of matters of discretion, which can be addressed through refinement rather than rejecting the rule in its entirety. A targeted rule is necessary to distinguish existing quarry activities from new activities, recognise their established baseline and investment, and provide a more certain and appropriate consenting framework that gives effect to the Regional Policy Statement and national direction. For the same reasons, Horokiwi continues to seek a consequential amendment to GRUZ-R15 to apply specifically to new quarrying activities, to ensure a clear and coherent rule framework that differentiates between new and existing quarries.

The table attached to this statement records Horokiwi's position and fully responds to the Section 42A Report.

In summary, Horokiwi supports the retention of the notified objectives and compatible-activities policy framework where these appropriately recognise operational and functional need. However, it continues to seek targeted amendments to better recognise the role of quarrying activities and to provide a more appropriate consenting pathway for lawfully established quarries outside the Quarry Zone.

Should you require clarification on any matter, please contact Ross Baker at Horokiwi Quarries Ltd by email at ross.baker@hql.co.nz.

Yours faithfully

Ross Baker
Horokiwi Quarries Ltd

Sub point	Plan Part / Sub-part / Chapter / Provision	Position	Summary of Submission	Decisions Requested	Section 42A Report Recommendation	Horokiwi Response to S42A Report
General Rural Zone						
246.28	GRUZ-O1	Support	Supports the objective in principle.	Retain Objective GRUZ-O1 as notified.	<p>Recommendation: Accept in part</p> <p>Reasoning in Section 42A Report: General Rural Zone (175) Horokiwi Quarries Ltd (246.28) and MoE (399.70) seek that GRUZ-O1 is retained as notified. Enviro NZ (323.56) is neutral.</p> <p>...</p> <p>(178) I recommend that the submission point of the Pork Industry Board (341.9) be accepted in part, however that intensive indoor primary production activities remain subject to clause (b) of GRUZ-O1.</p>	<p>The reporting officer's recommendation is generally supported, as the outcome is to retain Objective GRUZ-O1 as notified. It is noted, however, that the Section 42A Report does not explicitly state a recommendation to amend the objective, and no changes are proposed in the provisions. Accordingly, it is inferred that the intention is to retain the objective as notified.</p> <p>It is further noted that the recommendation for Horokiwi's submission point in Appendix 2 of the Section 42A Report is recorded as "accept in part". This appears to be an administrative error, as the reasoning provided relates to a different submission point (NZ Pork Industry Board), and Horokiwi sought retention of the objective without modification. On this basis, the recommendation in respect of this submission point should more appropriately be recorded as "accept."</p>
246.29	GRUZ-O2	Support	Supports the objective in principle, particularly the inclusion of reference to functional and operational need.	Retain Objective GRUZ-O2 as notified.	<p>Recommendation: Accept</p> <p>Reasoning in Section 42A Report: General Rural Zone (179) Horokiwi Quarries Ltd (246.29), Enviro NZ (323.57), FENZ (374.94) and the MoE (399.71) seek that GRUZ-O2 is retained as notified.</p> <p>...</p> <p>(182) I recommend that the submission point of the Pork Industry Board (341.9) be accepted in part, however that intensive indoor primary production activities are not provided for as predominant activities in GRUZ-O2.</p>	<p>The reporting officer's recommendation is supported and is consistent with the relief sought by Horokiwi in its submission. The Section 42A Report does not propose any amendments to Objective GRUZ-O2, and it is therefore inferred that the objective is to be retained as notified.</p> <p>While the Report discusses other submission points (including that of the NZ Pork Industry Board), these do not result in any recommended changes to the wording of GRUZ-O2. Accordingly, the recommendation appropriately reflects Horokiwi's position and requires no further amendment.</p>
246.30	GRUZ-P2	Support	<p>Horokiwi generally supports Policy GRUZ-P2. In particular:</p> <ul style="list-style-type: none"> • Clause 1(b)(ii), which recognises the operational <u>or</u> functional need of a quarry activity to be located within the General Rural Zone • Clause 2(e), which recognises quarrying activities as being potentially compatible within the General Rural Zone. <p>Notwithstanding this support, Horokiwi seeks an amendment to clause 2(e) to recognise that quarrying and cleanfill activities support a wide range of development, not limited to rural development. Quarry materials are used across residential, commercial, open space and infrastructure projects (e.g. roads, cycleways, and reserves). A broader reference to "development" is therefore considered more appropriate.</p>	<p>Retain policy GRUZ-P2 with amendment to clause 2. e) as follows: <i>GRUZ-P2 Compatible activities</i></p> <p>.....</p> <p>2. <i>Potentially compatible activities include:</i></p> <p>....</p> <p>e. <i>Cleanfill and quarrying activities that support rural development, and</i></p> <p>....</p>	<p>Recommendation: Reject</p> <p>Reasoning in Section 42A Report: General Rural Zone (210) Horokiwi Quarries Ltd (246.30) seek to include cleanfill and quarrying activities that support development in general rather than just rural development in the list of potentially compatible activities. They argue that development throughout the district benefits from quarry activities.</p> <p>...</p> <p>(218) I agree with Horokiwi Quarries submission. Quarry activities provide the basic raw material for development, and therefore benefit the district as a whole. However, larger scale development has potential effects on other primary industries. In these instances quarrying activities and cleanfill areas would be potentially incompatible.</p> <p>...</p> <p>(226) I recommend rejecting the relief sought by Horokiwi Quarries Ltd (246.30).</p>	<p>The recommendation to reject the relief sought is not supported. While no amendments to Policy GRUZ-P2 are recommended, the reporting officer acknowledges that quarry activities provide essential raw materials that benefit development across the entire district. Despite this, the officer raises concerns about the potential effects of larger-scale development on primary production activities and associated compatibility issues.</p> <p>Horokiwi considers that retaining the qualifier "rural" in clause 2(e) unnecessarily limits the scope and effectiveness of the provision. Quarrying and cleanfill activities are not solely linked to rural development; rather, they underpin a wide range of development outcomes, including urban growth, infrastructure and other regionally significant projects. Restricting recognition to "rural development" creates an artificial distinction that does not reflect how aggregate resources are actually used or supplied within the district. Deleting "rural" would provide greater flexibility, while still enabling decision-makers to assess compatibility and effects on a case-by-case basis. This approach better reflects the functional role of quarrying and is consistent with national policy direction, including the NPS-1 highlighted referred to earlier in this document.</p> <p>In addition, Horokiwi supports the reporting officer's recommendation to accept its further submission opposing the NZ Pork Industry Board (341.4) request to delete the list of potentially compatible activities in GRUZ-P2(2). Retaining this list provides useful guidance on compatibility within the zone, and this aspect of the recommendation is supported for the reasons set out in the Section 42A Report.</p>

246.31	New rule	Support	<p>Given the established nature of Horokiwi's sand extract activity at Fitzroy Bay, Horokiwi seeks specific recognition of the existing operation and a clear pathway for re-consenting. A restricted discretionary activity status is sought. Horokiwi accepts the provision may only be applicable to Horokiwi's activity, however we submit recognition of existing quarry activities outside the Quarry zone is appropriate to give effect to the RPS Objective 31 and Policy 60.</p>	<p>Insert a new rule as follows: <u>GRUZ-Rxx – Existing (and re-consenting) of existing lawfully established quarrying activities</u> <u>1. Activity status: Restricted discretionary</u> <u>Matters of discretion are restricted to:</u> <u>1. The effects on the amenity values of the surrounding area</u> <u>2. The importance of quarrying aggregate and meeting the supply demand for the city's use</u> <u>3. Dust, access and traffic</u> <u>4. The matters in GRUZ-P2</u></p>	<p>Recommendation: Reject</p> <p>Reasoning in Section 42A Report: General Rural Zone</p> <p>(352) Horokiwi Quarries Ltd (246.31) seeks a new rule to provide for existing legally established quarry activities. The proposed rule is as follows: ... (353) The submitter considers that recognition of existing quarry activities outside the Quarry zone is still appropriate to give effect to the RPS Objective 31 and Policy 60. (354) Winstone Aggregates (FS33.23) has made a further submission in support of Horokiwi Quarry Limited's submission. Winstone aggregates supports relief sought in so far as it does not relate to the Quarry Zone.</p> <p><i>Assessment</i></p> <p>(355) Objective 31 of the RPS is that: <i>The demand for mineral resources is met from resources located in close proximity to the areas of demand.</i></p> <p>(356) "Close proximity" is not defined although I note that the associated Anticipated Environment Result is that "Aggregate and hard rock, for local use, is sourced from within the Wellington region".</p> <p>(357) Policy 60 of the RPS requires Council to consider: a. the social, economic, and environmental benefits from utilising mineral resources within the region, and b. protecting significant mineral resources from incompatible or inappropriate land uses alongside.</p> <p>(358) Whilst I agree that the utilisation of the regions mineral resources is important, I consider that the existing resource consent is the appropriate method for managing the effects of quarrying. In addition, any change in intensification could be dealt with through discretionary activity pathway.</p> <p>(359) In addition, if the Council were to include a new rule I do not consider that the limitations of matters of discretion are sufficient. For Instance, noise is not included in the matters of discretion and this is a common matter associated with quarrying.</p> <p><i>Recommendation</i> (360) I recommend rejecting the relief sought by Horokiwi Quarries Ltd (246.31).</p>	<p>The recommendation to reject the relief sought is not supported.</p> <p>The reporting officer recognises the RPS direction and agrees utilisation of the region's mineral resources is important. However, they consider that changes to existing quarries, including those with resource consents, should be assessed as discretionary activities. The officer's concern primarily relates to the scope of the matters of discretion, noting that key effects (such as noise) are not currently included.</p> <p>In this context, the issue is not the appropriateness of a restricted discretionary activity status, but rather that the proposed matters of discretion are too narrow. This can be readily addressed through refinement, without rejecting the rule framework.</p> <p>For example, the matters of discretion could be expanded to include: a. Effects on the amenity values of the surrounding area, including noise and vibration b. Dust effects c. Traffic generation, access, and transport effects d. Effects on surrounding land uses, including primary production activities e. The scale and intensity of the activity relative to the receiving environment f. The importance of the quarrying activity in meeting the district and region's demand for aggregate g. The matters in GRUZ-P2</p> <p>In addition, the rule title can be improved for clarity and enforceability, such as to read "Reconsenting and Changes to Lawfully Established Quarrying Activities (Outside the Quarry Zone)".</p> <p>There are sound planning reasons why restricted discretionary status remains appropriate. These reasons include: <ul style="list-style-type: none"> Recognises the lawfully established nature and existing effects baseline of quarrying activities such as Fitzroy Bay; Recognises the existing investment and infrastructure of established quarries; Provides greater certainty for reconsenting and operational continuity of regionally significant aggregate supply; and Better gives effect to RPS Objective 31 and Policy 60, which require enabling ongoing use of mineral resources while managing effects. Also gives effect to Policy 5 of the NPS-I in enabling infrastructure supporting activities. <p>By contrast, a discretionary status fails to distinguish between existing and new quarrying activities and introduces unnecessary uncertainty for established operations that contribute a strategic role in supplying aggregate to the district and wider region.</p> <p>Accordingly, Horokiwi maintains that a new rule is appropriate, with refined matters of discretion, to provide a targeted and effects-based consenting pathway for reconsenting and changes to lawfully established quarrying activities (outside the Quarry Zone).</p> </p>
246.32	GRUZ-R15: Quarrying Activities	Support with amendment	<p>Horokiwi supports the rule in principle but seeks an amendment so that GRUZ-R15 applies specifically to <i>new</i> quarrying activities. This is on the basis that a separate rule is sought to address reconsenting and changes to existing quarries located outside</p>	<p>Amend Rule GRUZ-R15 as follows: <u>GRUZ-R15 – New Quarrying Activities</u> <u>1. Activity status: Discretionary</u></p>	<p>Recommendation: Reject</p> <p>Reasoning in Section 42A Report: General Rural Zone</p> <p>(299) Aggregate and Quarry Association New Zealand (202.5) and Enviro NZ (323.64) support rule GRUZ-R15.</p>	<p>The recommendation to reject the relief sought is not supported.</p> <p>The reporting officer's rationale is that existing quarrying activities—particularly where existing quarries expand or change—should be assessed on a case-by-case basis through a resource consent process, and that existing quarries may already managed through resource</p>

			<p>the Quarry Zone. This distinction is necessary to recognise the different planning considerations applying to new versus established quarry activities.</p>		<p>(300) Horokiwi Quarries Ltd (246.32) seek to amend GRUZ-R15 so that it only applies to new quarrying activities.</p> <p>...</p> <p><i>Assessment</i></p> <p>(301) The support of the Aggregate and Quarry Association New Zealand is noted.</p> <p>(302) With regard to the requested amendment from Horokiwi Quarries Ltd, I do not agree that the rule should be amended to solely address new quarrying activities. It is appropriate for the potential effects of quarrying activities to be assessed on a case-by-case basis through a resource consent process including when an existing quarrying activity expands or changes.</p> <p>(303) Any existing quarrying activities (that is, those that aren't "new" quarrying activities) would be authorised through a combination of resource consents, certificates of compliance and existing use rights, and would not need a resource consent under rule GRUZ-R15 unless the quarrying activities altered in a way that the resource consents, certificates of compliance or existing use rights no longer applied to the activity. In this situation, it would be appropriate for a resource consent to be required to enable an assessment of the change in the potential effects of the quarrying activities given the change to those activities.</p> <p><i>Recommendation</i></p> <p>(304) I recommend the submission point of the Aggregate and Quarry Association New Zealand (202.5) and Enviro NZ (323.64) be accepted.</p> <p>(305) I recommend the submission point of Horokiwi Quarries Limited (246.32), including the requested amendment to GRUZ-R15, be rejected.</p>	<p>consents, certificates of compliance, or existing use rights. Horokiwi acknowledges and generally agrees with this framework.</p> <p>However, this does not address the core issue raised in the submission. The purpose of the amendment is not to avoid assessment, but to ensure a clear and coherent rule framework that distinguishes between:</p> <ul style="list-style-type: none"> • New quarrying activities, which appropriately warrant a discretionary activity status; and • Existing, lawfully established quarrying activities, where the planning response should recognise their established baseline, operational needs, and strategic importance (as addressed through the proposed new rule in Submission Point 246.31). <p>Without this distinction, GRUZ-R15 conflates new and existing quarrying activities under a single rule framework, which does not adequately reflect their differing effects profiles and policy considerations.</p> <p>The reporting officer's concerns regarding the need for assessment of changes to quarrying activities are not undermined by the requested amendment. Rather, they are addressed through the proposed complementary rule for existing quarries, which provides a more targeted restricted discretionary framework.</p> <p>Accordingly, the requested amendment to GRUZ-R15 is consequential on the inclusion of a new rule for existing quarrying activities. If that rule is adopted, inserting "new" into GRUZ-R15 is necessary to avoid duplication and to ensure the plan framework is logically structured and internally consistent. On that basis, the amendment remains appropriate and is retained as sought.</p>
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