

RMA FORM 5

# Submission on publicly notified Proposed Porirua District Plan

Clause 6 of the First Schedule, Resource Management Act 1991

To: Porirua City Council

## 1. Submitter details:

Full Name	<i>Last</i> Harding	<i>First</i> <i>Jeremy</i>
Company/Organisation <i>if applicable</i>	Aggregate and Quarry Association	
Contact Person <i>if different</i>		
Email Address for Service	<a href="mailto:jeremy@straterra.co.nz">jeremy@straterra.co.nz</a>	
Address	P O Box 10-668 <i>City</i> Wellington	
	<i>Postcode</i> 6143	
Address for Service <i>if different</i>	<i>Postal Address</i>	<i>Courier Address</i>
Phone	<i>Mobile</i>	<i>Home</i> <b><a href="tel:0276316161">027 6316161</a></b>

2. This is a **submission** on the **Proposed District Plan** for Porirua.

3. I could  I could not   
 gain an advantage in trade competition through this submission.  
*(Please tick relevant box)*

If **you could** gain an advantage in trade competition through this submission please complete point four below:

4. I am  I am 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.  
*(Please tick relevant box if applicable)*

Note:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

5. I wish  I do not wish   
To be heard in support of my submission  
(Please tick relevant box)

6. I will  I will not   
Consider presenting a joint case with other submitters, who make a similar submission, at a hearing.  
(Please tick relevant box)

Please complete section below (insert additional boxes per provision you are submitting on):

**The specific provision of the proposal that my submission relates to:**

Please see the attachment

**Do you: Support? Oppose? Amend?**

**What decision are you seeking from Council?  
What action would you like: Retain? Amend? Add? Delete?**

Please see the attachment

**Reasons:**

Please return this form no later than **5pm on Friday 20 November 2020** to:

- Proposed District Plan, Environment and City Planning, Porirua City Council, PO Box 50-218, PORIRUA CITY or
- email [dpreview@pcc.govt.nz](mailto:dpreview@pcc.govt.nz)

18 November, 2020

Signature of submitter  
(or person authorised  
to sign  
on behalf of submitter):

Date: \_\_\_\_\_

*A signature is not required if you make  
your submission by electronic means*

# Submission on the Proposed Porirua District Plan

## November 2020

### Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing construction material companies which produce 45 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

Funded by its members, the AQA has a mandate to increase understanding of the need for aggregates to New Zealanders, improve our industry and users' technical knowledge of aggregates and assist in developing a highly skilled workforce within a safe and sustainable work environment.

AQA welcomes the opportunity to submit on the [Proposed Porirua District Plan](#) ("Proposed Plan"). We generally support the direction of the Proposed Plan subject to the amendments which are outlined in this submission.

In this submission we have provided:

- General comments on the Proposed Plan, and
- Specific submission points on the Proposed Plan, including suggested recommended amendments, provided in the table below.

### General Comments

Aggregate is a significant resource for the district, regional and national economies. A sustainable supply of aggregate is essential for continued development - to provide for building, construction and roading projects associated with growth, and to maintain and redevelop existing infrastructure.

While demand for aggregate continues to grow across New Zealand, current supplies are being exhausted, mandating a need to provide future supplies. It is important to note, aggregates are a site-specific resource, which means that extraction can only occur where the resource is found and can be economically extracted and transported to local markets (an additional 30 km travel cost typically doubles the cost of aggregate). Such aggregate resources must be found, subjected to feasibility studies, before necessary approval to extract is secured (involving consultation with affected parties), prior to extraction, and processing. To find, assess, seek approval and develop a new aggregate extraction and processing site can take many years at significant cost.

Aggregate extraction is a temporary land-use whereby the aggregate material is extracted and processed before the area is rehabilitated to a former use, or an alternative and/or enhanced use. Responsible environmental management using best practice approaches is an integral part of any aggregate extraction and processing venture.

## **Porirua Proposed District Plan**

This is one of the first Proposed District Plans that gives effect to the government's National Planning Standards (NPS).

The Proposed Plan includes revised land use rules and performance standards for the next 10-15 years or so within Porirua City. It has important implications for the extractive sector.

We are particularly interested in the provisions relating to quarrying activities within the General Rural Zone, Coastal Environment and areas of Special Amenity Landscapes and Outstanding Natural Features and Landscapes. These provisions are dealt with in turn in the following table.

We note there is a standalone chapter on Earthworks in the Proposed Plan. It appears as though these provisions could potentially apply to quarrying which could cause issues as quarry and quarrying activities have their own specific definition in the National Planning Standards and quarrying is included within the definition of "primary production". Such definitions are discreet from the definition of Earthworks in the National Planning Standards.

The AQA is interested in future growth and planning restrictions that have the potential to adversely affect the general operation of mineral extraction. In particular we want to ensure that:

- Aggregate resources are recognised as a significant and essential resource for development
- New planning provisions do not unreasonably restrict future access to aggregate resources
- New planning provisions provide for an efficient and cost-effective planning process to allow aggregate extraction and processing activities
- Development does not result in reverse sensitivity effects constraining existing or future mineral extraction activities.

Failure to adequately plan for future aggregate extraction within Porirua would lead to a substantial increase in costs of aggregate supply as a result of increased transportation costs, and this would have flow-on effects on the cost of development and maintaining existing infrastructure. It would also increase levels of heavy transport on local and state highway roads which will adversely affect the environment, New Zealand's economic productivity and the interests of road users generally.

Sound planning is required to ensure that future access to aggregate resources is sufficiently recognised, provided for and protected for future generations.

## Supply and Demand of Aggregate in Porirua

Porirua is a fast-growing community which has increasing demand for aggregate. High population growth and significant road and housing developments are expected in the near future.

Transmission Gully is, one of New Zealand's most significant roading infrastructure projects partially located in Porirua. It will have major benefits for Porirua once completed. Shortages of aggregate are said to be one factor holding up the completion of the road and aggregate is having to be trucked large distances from outside the region. This is a well-documented example of failure to plan for aggregate supply putting pressure on delivery of a major infrastructure project.

There is only one quarry in Porirua, Willowbank, which is used to supply Transmission Gully. Much of Porirua's general aggregate supply comes from quarries in neighbouring districts but there is increasing demand pressure on these too.

It is therefore ironic that Porirua has large areas of 'high potential' hard rock deposits as illustrated in the **attached** map provided by GNS Science.

We note that the Proposed Plan has a number of overlays including various environmental or landscape matters which overlap areas of aggregate resource shown in the map. For example, there is a Significant Amenity Landscape area that covers much of the aggregate resource in the district. To avoid sterilisation of scarce resource, it is important that these overlays do not restrict quarry operations or cover known aggregate resources.

Table: Specific submission points on the Proposed District Plan

REF	Provision	Support / Oppose	Comments
<b>Part 1.</b> Definitions	Definitions	Support	We support the use of NPS definitions used for the following: primary production, quarry, quarrying activities, cleanfill area, and cleanfill material.
<b>Part 2.</b> RE-O2	Rural lifestyle living strategic objective	N/A	Include a reverse sensitivity objective at the strategic level. Propose the following – 6. Designed and located to avoid, remedy or mitigate reverse sensitivity effects on existing or permitted activities.
<b>Part 2.</b> EW-S3	The transport of material resulting from or required for earthworks (including earth, soil, clay, sand and rock) off or onto the site must not exceed 200m3.	Oppose	It is important that the volume of fill aligns with the Greater Wellington Regional Council permitted activity requirements. GWRC has a permitted cleanfill rule of 400m3 and therefore it is recommended this rule be amended accordingly.
<b>Part 3.</b> FUZ-O3	Maintaining the development potential of the Future Urban Zone <b>6.</b> Reverse sensitivity effects on existing rural activities or infrastructure; or	Oppose	Rural activities should be replaced with primary production activities to be explicitly clear. Insert 'proposed' so it reads "proposed and existing"
<b>Part 3.</b> FUZ-P6	Inappropriate use and development in Future Urban Zones. Avoid use and development that may result in the future development potential of the Future Urban Zone being compromised.	Support	We support this but think it should be strengthened so it recognises key infrastructure and future development. Activities that support infrastructure development should not be compromised in a rural zone by future urban development. It is important that reverse sensitivity issues are avoided in future.
<b>Part 3.</b> GRUZ	GRUZ - General Rural Zone	Support	We support the use of the term 'primary production activities' in this section. This is preferable to the term 'rural activities' because quarrying and mining are specified in the definition of primary production activities and so it is clearer.
<b>Part 3.</b> GRUZ-O4	Recognising benefits of mineral extraction and processing	Support	We are pleased that the benefits of mineral extraction and processing activities to the city and the region are recognised and provided for in the General Rural Zone
<b>Part 3.</b> GRUZ-P5	Quarrying activities and mining	Support	This provides for new quarrying activities or mining activity in the General Rural Zone where a number of conditions can be demonstrated. In general, we support this and most of the conditions stipulated with the exemptions of GRUZ P5 – <b>4.</b> and <b>5.</b> see below.

REF	Provision	Support / Oppose	Comments
<b>Part 3.</b> GRUZ-P5	Quarrying activities and mining <b>4.</b> Areas of indigenous vegetation are retained where practicable.	Oppose	We support this sentiment but for clarity, it should be amended so that if vegetation clearance does occur, there should be the ability to remedy, mitigate, offset or compensate.
<b>Part 3.</b> GRUZ-P5	Quarrying activities and mining <b>5.</b> It avoids or mitigates any adverse effects on waterbodies and their margins	Oppose	We support this sentiment but for clarity, in addition to avoid or mitigate adverse effects, there should be the ability to remedy, offset and compensate for adverse effects.
<b>Part 3.</b> GRUZ-P6	Site Rehabilitation	N/A	If the site is to be rehabilitated to be primary production-based activity land, the land use zone will not change
<b>Part 3.</b> GRUZ-P7	<b>7.</b> Potentially inappropriate activities	Support	We support the inclusion of this reverse sensitivity policy.
<b>Part 3.</b> GRUZ-R6	Primary production, excluding quarrying activities, mining, intensive indoor primary production and rural industry - Permitted	Oppose	Note: Primary production, <b>excluding</b> quarrying activities, mining, intensive indoor primary production <b>and</b> rural industry is permitted. We do not agree with the separate treatment of quarrying activities from the rest of primary production
<b>Part 3.</b> GRUZ-R11	Visitor accommodation	Oppose	We are concerned about the increased reverse sensitivity issues that arise with this activity in a rural zone especially if the cap is lifted and there is opportunity for growth.
<b>Part 2.</b> INF	Infrastructure Chapter, within Part 2 District Wide matters	N/A	It does not appear that there is any explicit connection between recognising supporting industry or activity for example quarries are needed to construct and support infrastructure.
<b>Part 4.</b> SCHED 10	Special Amenity Landscapes	N/A	To avoid sterilization of scarce resource, it is important that overlays for various environmental or landscape matters do not restrict quarry operations or cover known aggregate resources.

## Appendix – Aggregate Potential in Porirua City

