

7 February 2023

Wellington City Council Proposed District Plan
Wellington City Proposed District Plan Hearings Panel

Email: District.Plan@wcc.govt.nz

Boffa Miskell



Dear Sire/Madam

**Wellington City Proposed District Plan 2022: Hearing Stream 1 – Strategic Direction:
Hearing Statement for Horokiwi Quarries Limited (submitter reference 271)**

Horokiwi Quarries Limited (“Horokiwi”) writes in relation to Hearing Stream 1 - Strategic Direction that is scheduled to commence on Tuesday 21 February 2023.

There are a limited number (four original and 1 further) of submission points of relevance to Horokiwi that are being considered as part of Hearing Stream 1 and on that basis, Horokiwi has not requested to be heard or filed evidence. That said, Horokiwi is available to respond to any questions the Hearings Panel may have.

In response to submission point 271.16 seeking a new strategic objective, Horokiwi is fully supportive of the S42A report recommendation for the provision of a new strategic objective relating to the benefits of quarrying activities. As outlined in the introductory text to the Horokiwi submission, quarrying activities (outside the Special Purpose Quarry Zone) have a challenging role in the PDP. Despite their resource dependence and functional constraints, and necessity in enabling infrastructure, they are not recognised as ‘Infrastructure’ within the PDP. While Horokiwi supports the provision of a specific Quarry Zone in the PDP, the plan does not address the absence of policy recognition within the PDP of a new quarry site, or expansion of an existing site outside the Quarry Zone. Given the importance of quarries to the city and region, Horokiwi would support policy recognition outside the Special Purpose Quarry zone, and specific to the strategic objectives, the provision of a strategic objective which recognises the benefits of mineral utilisation. Such policy recognition would be consistent with the Greater Wellington Regional Council Proposed Natural Resources Plan Policy 12A, and the Regional Policy Statement Policy 60. Horokiwi notes there are no further submissions to their submission point 271.16.

Horokiwi notes the recommendations on submission points 271.2 and 271.3 (seeking wider policy recognition for quarries in the PDP outside the Special Purpose Quarry Zone) refer back to the recommendation for a new strategic objective (refer above recommendation on 271.16) and do not specifically address the sought policies. Horokiwi anticipates the relief sought in these two points will be further addressed in Hearing Stream 7 (Hearings stream 7 – Rural and Open Space, District Wide Matters, Special Purpose Zones) along with

submission point 271.4¹ (which also sought a new policy outside the Special Purpose Quarry Zone). Horokiwi supports such an approach as it allows the bulk of the Horokiwi submission to be addressed comprehensively at one hearing.

The S42A Report recommendation on the remaining two submission points (S271.12 and FS28.2) relevant to Hearing Stream 1 are supported.

For completeness Horokiwi records its position in respect of the relevant matters in the attached table.

Horokiwi respectfully requests that this letter be tabled for the Panel's consideration, to confirm its position in relation to its submission points and the Section 42A Report recommendations.

Should you require clarification of any matter, please contact Pauline Whitney at Boffa Miskell Ltd (04 901 4290), or on the following email: pauline.whitney@boffamiskell.co.nz

Yours faithfully

A handwritten signature in black ink, appearing to read 'P. Whitney', written in a cursive style.

Pauline Whitney
Senior Planner/Senior Principal
BOFFA MISKELL LTD

¹ The S42A Report Appendix B lists this point on page 17 but notes it will be addressed at Hearing Stream 7 (Rural and Opens Paces, District Wide matters, Special Purpose zone). No specific commentary is provided within the S42A Report.

Attachment 1: Horokiwi Quarries Ltd position in response to s42A recommendations, Wellington City PDP Hearing Stream 1 – Strategic Direction

Sub Ref	PDP Reference	Relief Sought in Horokiwi’s Submission	S42A Report Recommendation	Horokiwi’s Response to S42A Report Recommendations
Part 2 / Strategic Direction / City Economy Knowledge and Prosperity				
271.16	Part 2 / Strategic Direction / City Economy Knowledge and Prosperity	<p>Considers that there is an absence of policy recognition within the PDP of a new quarry site, or expansion of an existing site outside the Quarry Zone. Given the importance of quarries to the city and region, Horokiwi would support policy recognition outside the Special Purpose Quarry zone, and specific to the strategic objectives, the provision of a strategic objective which recognises the benefits of mineral utilisation. Such a policy would be consistent with the Greater Wellington Regional Council Proposed Natural Resources Plan Policy 12A, and the Regional Policy Statement Policy 60.</p> <p>Add new strategic objective as follows: CEKP-O6: <u>When considering proposals that relate to the use of the Region’s mineral resources, particular regard will be given to the benefits from the utilisation of those resources in the form of quarrying activities.</u></p>	<p>Recommendation: Accept in part. Amend S42A reference: Addressed in SCA. Point 851, page 167 Point 869, page 170 Point 968, page 184 Point 1004, page 188</p> <p>Section 42A Commentary: I accept the intent of the submission by Horokiwi Quarries [271.16 and 271.3] but consider that the new objective should be included in the ‘Strategic City Assets and Infrastructure’ chapter. This submission point is dealt with in the assessment for that chapter below.</p> <p>I agree with the submission of Horokiwi Quarries [271.16 and 271.3] on the City Economy, Knowledge and Prosperity chapter that a new objective should be added recognising the strategic benefits of quarrying activities to the city. Currently, quarries do not fall within the definition of infrastructure so do not benefit from the strategic direction of the chapter, yet arguably they have great importance to supporting the city’s infrastructure and development. At a strategic level, enabling continued operation of quarries at Horokiwi and KIWIPPOINT and when necessary, new quarries within the city for local use is likely to have less environmental effects (including carbon emissions from transportation of material) than establishing or relying on out of city quarries for the same material. This is consistent with the intent of Policy 60 of the RPS and Policy 12 of the PNRP as noted by the submitter.</p> <p>Add a new objective to the Strategic City Assets and Infrastructure chapter to the effect of:</p>	<p>Horokiwi supports the recommendation for the reasons outlined in its original submission and that of the reporting officer.</p>

			<u><i>The benefits of and contribution to the development of the city's infrastructure and built environment from the utilisation of the city's mineral resources from quarrying activities are recognised and provided for.</i></u>	
271.3	Whole PDP / Whole PDP / Whole PDP	<p>Considers that there is currently no plan wide recognition of the need and benefits of quarrying activities. While the General Rural zone provides one specific policy (GRUZ-P6), it relates to effects as opposed to the benefits of quarry activities and therefore is limited in its scope. While the Special Purpose Quarry Zone has a policy (and rule) framework it relates to existing quarry sites within the Special Purpose Quarry Zone only and does not have plan wide application, including for any expansion of existing quarries outside the Quarry Zone. Horokiwi suggests that the most logical place for some form of plan wide recognition of quarrying activities would be within the Infrastructure Chapter. However, it is recognised the quarries are not infrastructure as defined in the PDP. As such, as an alternative Horokiwi would support the policy recognition in other parts of the PDP (outside the Special Purpose Quarry Zone).</p> <p>Add a new policy within the PDP (outside the Special Purpose Quarry Zone) as follows: <u><i>The benefits of quarrying activities to the city and region are recognised and provided for.</i></u></p>	<p>Recommendation: Accept in part. Amend S42A reference: Addressed in SCA. Point 851, page 167 Point 869, page 170 Point 968, page 184 Point 1004</p> <p>Section 42A Commentary: I accept the intent of the submission by Horokiwi Quarries [271.16 and 271.3] but consider that the new objective should be included in the 'Strategic City Assets and Infrastructure' chapter. This submission point is dealt with in the assessment for that chapter below.</p> <p>I agree with the submission of Horokiwi Quarries [271.16 and 271.3] on the City Economy, Knowledge and Prosperity chapter that a new objective should be added recognising the strategic benefits of quarrying activities to the city. Currently, quarries do not fall within the definition of infrastructure so do not benefit from the strategic direction of the chapter, yet arguably they have great importance to supporting the city's infrastructure and development. At a strategic level, enabling continued operation of quarries at Horokiwi and Kiwipoint and when necessary, new quarries within the city for local use is likely to have less environmental effects (including carbon emissions from transportation of material) than establishing or relying on out of city quarries for the same material. This is consistent with the intent of Policy 60 of the RPS and Policy 12 of the PNRP as noted by the submitter.</p>	While Horokiwi supports the provision of a new strategic objective (refer submission point 271.16) the S42A response to 271.3 does not recognise that Horokiwi is seeking a new policy. Horokiwi anticipates this matter will also be addressed at Hearing 7 (as per 271.4)
271.2	Whole PDP / Whole PDP / Whole PDP	<p>Considers that quarrying activities (outside the Special Purpose Quarry Zone) have a challenging role in the PDP. Despite their resource dependence and functional constraints, that they are essential to enabling the growth the city and enabling the construction of key infrastructure (such as providing material for cycleways and road, fill material for the repair and maintenance of three waters infrastructure), and they provide essential construction</p>	<p>Recommendation: Accept in part. Amend S42A reference: Point 851, page 167.</p> <p>Section 42A Commentary: Horokiwi Quarries [271.16 and 271.3] seeks the addition of a new policy to recognise new quarrying activities, including outside of the Quarry zone [271.2] (opposed by WCC ERG [FS112.36]).</p>	While Horokiwi supports the provision of a new strategic objective (refer submission point 271.16) the S42A response to 271.2 does not

		material for new dwellings, they are not recognised as 'Infrastructure' within the PDP. Concerns as to the lack of recognition (in particular policy recognition) of quarry activities within the PDP outside the Special Purpose Quarry Zone.		recognise that Horokiwi is seeking a new policy. Horokiwi anticipates this matter will also be addressed at Hearing 7 (as per 271.4)
271.12	Interpretation Subpart / Definitions /FUNCTIONAL NEED	Supports the definition on the basis it reflects the National Planning Standards and provides certainty for users. Retain the definition of FUNCTIONAL NEED as notified.	Recommendation: Accept. No change recommended. S42A reference: Point 572 and 574, page 131. Section 42A Commentary: No change.	Horokiwi supports the retention of the definition as sought in the Horokiwi submission
FS28.2	CKEP-O5	Aggregate and Quarry Association [303.11] seek that a reference be made to quarrying as a strategically important asset in CEKP-05. This point was supported by Horokiwi Quarries Limited (FS28.2).	Recommendation: Accept in part S42A reference: Point 866, page 169, Point 880, page 171 Section 42A Commentary: Accept, but also considers that the new objective should be included in the 'Strategic City Assets and Infrastructure' chapter. This submission point is dealt with in the assessment for that chapter below.	Horokiwi supports the recommendation for a new strategic objective as recommended for point 271.16