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Greater Wellington Regional Council
Environmental Policy
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Via email: regionalplan@gw.govt.nz

Submission on Proposed Change 1 to the Regional Policy Statement

1. Fulton Hogan welcomes the opportunity to comment on the draft changes that the Greater Wellington Regional Council is proposing to the Regional Policy Statement.

2. Fulton Hogan is one of New Zealand's largest roading and infrastructure construction companies, employing close to 4800 staff in New Zealand. We are proudly New Zealand owned and operated.

3. Fulton Hogan undertakes numerous activities throughout New Zealand including:

    - Gravel extraction, both within river beds and within land-based quarries/pits;
    - Aggregate processing and storage;
    - Infrastructure development and maintenance activities, either directly or on behalf of third parties (including roading contracts for the State Highway network on behalf of Waka Kotahi, and local roads on behalf of the territorial authority);
    - Asphalt and bitumen manufacture and bulk storage;
    - Pre-cast concrete manufacture and storage;
    - Hazardous substance use, transport and storage; and
    - Ancillary activities including workshops, transport depots, storage yards, staff offices, and supporting infrastructure (including wastewater, stormwater, and potable water).

4. Fulton Hogan's construction and quarrying activities contribute to the sustainable management of resources for the wider benefit of people and communities. Aggregate resources are critical for society. Where aggregates and aggregate-based products are not available at a reasonable cost, this has a fundamental effect on the ability of communities to provide roading, building and other vital infrastructure.

5. Aggregate resources are locationally constrained (i.e. extraction activities must be located where the aggregate naturally occurs). It is critical that Regional Policy Statements (RPS) recognise and provide for the extraction of aggregate resources, as these contribute to the construction and maintenance of cost effective building, roads and housing. Aggregate extraction (quarrying) consent processes are often long, difficult and expensive because there is not a good understanding of the importance of aggregate in the objectives and policies of regional and district plans. This policy direction must be led from the RPS.

6. The importance of aggregate supply has been recognised in recent national policy direction such as the proposed draft of the National Environmental Standard for Freshwater (NES-F), and the National Policy Statement for Highly Productive Land (NPS-HPL). It is important that this support flows through the planning document hierarchy. We support the recognition that has been provided in the RPS to date, and request that the national policy direction recognising the importance of aggregates be continued through the document.

7. We note that some of the national policy which guides the updates to the RPS (for example the National Policy Statement for Indigenous Biodiversity (NPS-IB) and NES-F are yet to be finalised, and we trust that the final versions of these policies will be included into the final version of the RPS update.

Closing

8. We have provided our comments in the table appended to this letter.

9. Thank you for providing an opportunity to comment on Change 1 to the RPS, and for taking the time to read this submission.

Yours sincerely



Helen Caley
National Resource Consents Planner

RPS Provision	Fulton Hogan comment	Relief requested (alterations from the proposed text indicated by underline or ~~strike through~~)
Introduction to Chapter 3.4	This introductory text sets the scene and, at a high level, discusses resource management issues facing the region. Shortages of resources, including aggregate, is often poorly understood by the general public and planners. We request that explicit mention be included in this text to help build understanding of these issues.	*The overarching resource management objective for the Wellington Region is: Objective A: Integrated management of the region's natural and built environments is guided by Te Ao Māori and:* *(a) incorporates mātauranga Māori; and* *(b) recognises ki uta ki tai – the holistic nature and interconnectedness of all parts of the natural environment; and* *(c) protects and enhances mana whenua / tangata whenua values, in particular mahinga kai, and the life-supporting capacity of ecosystems; and* *(d) recognises the dependence of humans on a healthy natural environment; and* *(e) recognises the role of both natural and physical resources (including the need for building materials such as aggregate) in providing for the characteristics and qualities of well-functioning urban environments; and* *(f) responds effectively to the current and future pressures of climate change, population growth and development.*
Policy 24	This policy appears to respond to the guidance provided by the NPS-IB, which is currently in draft. This policy should respond to the final version of the NPS-IB.	Make changes consistent with the NPS-IB when it is finalised.
Policy 39	This policy relates to renewable energy and regionally significant infrastructure. National policy direction including the proposed revision to the NES-F and NPS-HPL Include recognition of regionally and nationally significant aggregate resources. This policy would be an ideal location to provide recognition of the importance of these resources and reflect the policy direction from the national policy documents.	Add clause e) *e) the need for quarrying activities to locate where aggregate (clay, silt, rock or sand) resources exist.*
Policy 40	Clause h) is not clearly phrased, it is recommended that this clause be re-worded to clarify its intent.	*(h) protecting ~~the~~ significant indigenous ecosystems and habitats of rivers and lakes with significant indigenous biodiversity*

		values ~~of rivers and lakes~~, including those listed in Table 16 of Appendix 1;
Policy 41	While it is important that improvements are made where water quality outcomes are not met, the use of very directive "avoid" policies needs to be very carefully used. It is often not feasible to undertake day to day activities such as construction without having some level of discharge of sediment. If this is phrased as a very stringent "avoid" policy there is the potential that a large number of typical activities could not be undertaken.	*(b) ~~avoiding~~ <u>minimising</u> discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.*
Definition of "Maintain /maintained /maintenance (in relation to indigenous biodiversity)"	This definition appears to respond to the NPS-IB, and should be consistent with the final version of that policy.	
Definition of "regionally significant infrastructure"	Given the recognition that has been provided in national level policy such as the NES-F and NPS-HPL for aggregate extraction, we recommend that there be provision for regionally or nationally significant aggregate quarries in the definition of "regionally significant infrastructure"	Add a bullet point to the activities listed in the definition of regionally significant infrastructure. *Regionally significant infrastructure includes…* • *Aggregate extraction that provides significant national or regional public benefit that could not otherwise be achieved using resources within New Zealand.*