

Submission on the draft Canterbury Regional River Gravel Management Strategy

April 2025

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing construction material companies which produce an estimated 48 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.

Key points of our submission

- Extraction of aggregate and sand is essential for improving flood resilience, providing aggregate for communities, and enabling employment opportunities.
- In general, we support the four integrated outcomes that underpin this strategy.
- We strongly support the continuation of gravel authorisations.
- Council commitment to improved and timely data collection and analysis of whole of river systems is supported and needs to be supported by ongoing committed funding.
- We suggest replacing the wording in RC-1 to:

“Limit the maximum volume and duration of extraction to 60,000m³ and 12 months respectively, except as provided in RC-2 and RC-3.”

We make the following submission in relation to the Environment Canterbury's draft [Canterbury Regional River Gravel Management Strategy](#).

Part 1 – Introduction

Area covered by the Strategy

Reference is made in the Strategy to “Waitaha”, which is an area that is not defined. If it is intended that “Waitaha” is an alternative reference to the area covered by the Canterbury region, then this should be made clear in the document. Alternatively, all references to “Waitaha” should be replaced with the words “Canterbury region” to enable users of the Strategy to understand the area to which this document applies.

Part 2 – Resource management planning and legal context

There is comment on page 8 that none of the seven National Environmental Standards (NES) expressly allow gravel extraction, so gravel extraction can only occur under permitted activities in regional plans or resource consents. To clarify, aggregate extraction is exempt from the provisions of the NES-FM where such extraction is nationally or regionally significant, there is a functional need for the extraction to occur at that location and the Environmental Effects Hierarchy is used to manage environmental effects.

Part 3 – Outcomes and objectives

In general, we support the four integrated outcomes that underpin this strategy.

It is important that the Code of Practice enables gravel extraction where and when required to deliver community flood and river resilience. This includes the continuation of gravel authorisations where gravel extraction enhances flood and river resilience and safeguards community infrastructure. We are happy to be involved in the development and review of the Code of Practice (page 10).

Council commitment to improved and timely data collection and analysis of whole of river systems is supported and needs to be supported by ongoing committed funding. This whole of river modelling and assessment of sediment sources and flows will be key to understand the sediment supplies to the coast and coastal nourishment.

Clarity is needed on whether the onus is on the extraction operator to provide supporting analysis “in the lower 5km of rivers” or that will be supplied by council, along with explanation of the 5km threshold from the coastline. Noting a significant proportion of public roading and infrastructure is located close to the Canterbury coastline (page 10).

We welcome Papatipu Rūnanga to upskill and enhance extractors’ understanding of mātauranga Māori and practice for river-based gravel extraction. This will lead to greater clarity and/or certainty on cultural impact assessments and the expectations of extraction operators (page 12).

We support and encourage spatial planning through Environment Canterbury’s engagement with territorial authorities to understand the location of scheduled roading and development projects that will generate significant gravel demand so they can be best aligned with any nearby sites needing gravel extraction (page 13).

Part 4 – Decision-making criteria

We strongly support the continuation of gravel authorisations, as they enable extraction when and where required for flood and erosion protection.

Decision making – Resource consents

In RC-1 we are concerned with the use of the word “avoid” which has in certain situations been deemed to mean “prohibit”. Prohibiting extraction over the limits in RC-1 is

inconsistent with RC-2 and RC-3 which allow greater than 60,000m³ and 12 months. We suggest replacing the wording in RC-1 to:

“Limit the maximum volume and duration of extraction to 60,000m³ and 12 months respectively, except as provided for in RC-2 and RC-3.”

General comments

We agree that extraction of aggregate and sand is essential for improving flood resilience, providing aggregate for communities, and enabling employment opportunities.

Accessing, extracting, processing and transporting aggregate is required for the construction of infrastructure in Canterbury. Aggregates form the foundation of every road and building, either directly or as part of materials such as concrete. There will be increased demand for aggregate to build infrastructure and housing to meet population projections, and to address the region's infrastructure deficit.

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