

Submission on the discussion document **Modernising conservation land management**

February 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

- We support the objectives of the discussion document and proposals to streamline national level policies, planning documents, and statutory timeframes.
- The criteria used for competitive tendering would need to take account of situations where concessions are required for only a part of an operation e.g. access to the site.
- We therefore strongly support amending the legislation to clarify that existing concessions on Department of Conservation (DOC) land can continue under agreed terms regardless of reclassification or disposal of such land.

We make the following submission in relation to the discussion document [Modernising conservation land management](#).

Streamlining the conservation management system

We support replacing the two national-level policies – the Conservation General Policy (CGP) and the General Policy for National Parks (GPNP) – with a single National Conservation Policy Statement (NCPS). This will reduce complexity within the system by providing more clarity and certainty for concession applicants and support faster concession decision making.

We also support the replacement of the two layers of planning documents that currently sit underneath the NCPS with a single layer of area-based plans without overlapping coverage. Having all relevant rules and guidance in one planning document will simplify the application process and make it easier to update plans to take advantage of evolving economic activities and opportunities.

The statutory timeframes proposed in 5.3.6 will speed up revisions to plans and support them in remaining up to date. It is important however that there are mechanisms to ensure timeframes are achieved.

Driving better performance and outcomes from concessions

We agree a move away from first-come, first-served to allocate concessions could be beneficial for both conservation and economic outcomes. However competitive allocation of concessions as an alternative would not work well in the case of quarrying.

Concessions are needed by quarrying companies so that associated activities not covered by an access arrangement can be undertaken. For example, a concession to build an access road to a quarry may be required for that quarrying operation on private land. If that quarry operator were to lose a competitive tender for a concession to build an access road to the quarry, the overall project could be jeopardised.

The criteria used for competitive tendering would need to take such circumstances into account. Likewise, as with the allocation of mining permits, the capability of the applicant should be considered as part of the criteria.

Concessions should not be short term because of the uncertainty that arises when a concession is due to expire. The timeframe should be linked to associated access arrangements.

There would need to be a compensation regime put in place to support time-limited options for commercial activities i.e. if a quarry operator loses their concession, compensation would need to be paid. For example, to use the access road example above, if a quarry invests in a road and subsequently loses its concession, compensation would need to be paid for the investment the quarry operator has made in the road, which will now be to the benefit of another operator.

In general, we support the strategic allocation of concessions (and access arrangements). As acknowledged in the document, these will not always prioritise conservation values and that is entirely appropriate as other benefits to society, such as economic and recreational, from conservation land access need to be allowed for.

Enabling more flexibility for land exchanges and disposals

We support the proposition that while there are strong conservation reasons for having some restrictions, land disposal settings could also be adjusted to support cases where they can support positive conservation outcomes.

Currently extraction of aggregates on DOC land is essential for flood mitigation, river restoration, and the construction and maintenance of tracks, carparks and structures in national parks and on other DOC land. An example is the extraction of rock and gravel from conservation land adjoining the Waiho River near Franz Josef Glacier to help protect its walking tracks. This sensible and pragmatic decision saved DOC a fourfold amount – and considerable carbon emissions – from the alternative of trucking material a long distance.

Quarries successfully operate under concessions on numerous parcels of DOC land and therefore it is critical that the ongoing status of concessions is not disrupted if eligible areas of land are exchanged or disposed. Any reclassification process must provide certainty that concessions will continue regardless of reclassification or disposal.

We therefore strongly support amending the legislation to clarify that existing concessions on stewardship land can continue under agreed terms regardless of reclassification or disposal.

General comments

We agree that the processing of concession and access arrangement applications is an increasingly lengthy and burdensome process. We have had examples in our sector of relatively simple five-year concessions taking three years to process, meaning most of the duration of the concession is taken up with applying for the next one.

The rules that govern the system need to be clear, consistent and able to be updated to reflect changes in how people interact with places and how those places can be protected. The rules should provide for faster and simpler approval of quarries and aggregate extraction activities on DOC land necessary for the delivery of aggregates (including sand) for DOC's own use and to supply nationally and regionally significant projects.

Additionally, as catastrophic events in recent years have highlighted, the impacts of climate change, including rising sea levels, will put added pressure on rock supply for sea walls, riverbank protection and restoration, and other climate adaptation solutions.

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