

# Submission from the AQA on the Eastern Bay Spatial Plan

November 2024

## Introduction

1. The Aggregate and Quarry Association (AQA) is the industry body representing quarrying companies which produce 45 million tonnes of aggregate and quarried materials consumed in New Zealand each year.
2. We would like to thank the four councils encompassing the Eastern Bay sub-region<sup>1</sup> and the Iwi and other stakeholders involved, for the opportunity to comment on the [Our Places website for the Eastern Bay Spatial Plan](#).
3. The Aggregate and Quarry Association is interested in the Eastern Bay Spatial Plan because of the need to protect aggregate and other quarry materials from competing land use and future development of the district, and to highlight its role in that development. Our comments are confined to issues relating to this.

## Key points

4. We are concerned about the lack of mention of sand and aggregates in the Eastern Bay Spatial Plan.
5. The spatial plan needs to be clear that continued access to sand and aggregates will be planned for, and access will not be impeded by future development and alternative land uses.
6. Council planning must identify where rock is located and protect those areas from other development and alternative land uses so that access to such resources is not lost.

## Aggregates and Eastern Bay

7. Aggregate (crushed rock, gravel and sand) is an essential resource for the construction of housing, roading projects and other transport infrastructure. It is used for general construction – in concrete, asphalt, mortar and other building products.
8. It is also important for increasing resilience and adapting to extreme weather events and climate change.
9. Due to ongoing construction and infrastructure development activity around New

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<sup>1</sup> The Whakatāne, Kawerau, and Ōpōtiki district councils within the Bay of Plenty Regional Council

Zealand, there is a growing demand for aggregate.

10. The Eastern Bay sub-region faces, and will continue to face, significant demand for aggregate to support infrastructure, housing and other construction activity.
11. As the Our Places website says, in 2023, the Eastern Bay was home to about 57,000 people. It is projected that around 12,000 more people will live in the sub-region by 2055 requiring an extra 5,500 more houses, or 183 per year.
12. Based on the rule of thumb of 280 tonnes of sand and aggregate per house, approximately 1.54 million tonnes will be needed over the period, or 51,330 additional tonnes per year. This excludes that needed for relevant infrastructure to support the increase in housing.
13. There are also likely to be significant roading and highway developments in the area to the Port of Tauranga and other parts of the wider Bay of Plenty region which will be a drain on local quarries.
14. The Ōpōtiki Wharf development project is a useful reminder of the importance of a good source of local rock. Large quantities of rock were needed for the project and the nearest existing quarries were 100km away. The AQA and GNS Science worked with the council and new sources of rock close to Ōpōtiki were identified. The local supplies were able to significantly reduce transport costs and thus the cost of the development.

### **Protect access to potential aggregate resources**

15. For these reasons, we consider the lack of any real mention of sand and aggregates in the Our Places website to be a concern.
16. We believe there needs to be an acknowledgement of the role and contribution of aggregate and quarrying in Eastern Bay's future development and, in particular, the spatial plan needs to be clear that continued access to sand and aggregates will be planned for, and access will not be impeded by future development and alternative land uses such as housing.
17. The AQA would be happy to talk to the councils in the sub-region about what is known about where potential resources lie and work being done at the national level on this.
18. It is also important to be aware that aggregate deposits are 'location specific'. They can only be sourced from where they are physically located and where the industry is able to access them.
19. Council planning must identify where the rock is located and protect those areas from new development and alternative land uses so that access to such resources is not lost.
20. Due to its weight and volume, aggregate is very expensive to transport. An additional 30kms of travel typically doubles the cost of aggregate. This highlights

that shifting large volumes from outside the region or far from where it is to be used is very expensive and would increase the cost of many of the proposed projects.

21. The aforementioned characteristics of aggregate deposits mean that quarries should be close to residential and other areas where the aggregate is likely to be needed, but not too close to cause problems for either the quarry or the residential area and associated activities in terms of reverse sensitivity issues.

### **Highly productive land**

22. As the website notes, parts of the sub-region are classified as containing highly productive soils. Highly productive land is generally avoided for urban development purposes under the National Policy Statement for Highly Productive Land (NPS-HPL). Although we note this is currently being reviewed by central government.
23. It needs to be noted that land containing quarry materials is also highly productive. In fact, it is significantly more productive than soils used for agriculture due to the value and scarcity of the aggregates produced relative to the value of agricultural commodities.
24. Like highly productive soils, aggregate deposits can only be sourced from where they are physically located and where the industry is able to access them. It will be important that potential quarry land is not sterilised by the NPS-HPL, or its successor, or by any other efforts to protect highly productive land.

### **Conservation land**

25. We note 27% of the sub-region is managed by the Department of Conservation, which is a significant proportion. It is quite possible that workable quantities of accessible aggregate are located on conservation land.
26. We acknowledge that not all conservation land is appropriate for extractive activities, but some will be, if done under the right conditions where the appropriate consents, permits and approvals are issued by the relevant authorities. For this reason, we recommend that the possibility of future extraction on conservation land in the plan is not ruled out and if extraction is feasible, early engagement with the Department of Conservation takes place.

### **Increasing resilience**

27. As the website says, the Eastern Bay is prone to flooding, coastal erosion and other events which will be made worse by climate change as weather patterns become more intense and more frequent.
28. Aggregates will play a major role in increasing Eastern Bay's resilience and adapting to extreme weather events and climate change. Flood infrastructure, such as stopbanks and floodwalls, in particular are reliant on aggregate.

## Conclusion

29. To future proof the Eastern Bay sub-region and minimise the risk of future shortages of quarry materials, the spatial plan needs to protect aggregate resources from future development. Failure to do so will mean it will have to be sourced, at some expense, from outside the sub-region.

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