

# Submission from the AQA on the Proposed Kaipara District Plan

June 2025

## Introduction

1. The Aggregate and Quarry Association (AQA) is the industry body representing quarrying companies which produce 48 million tonnes of aggregate and quarried materials consumed in New Zealand each year.
2. We would like to thank the Kaipara District Council for the opportunity to comment on the [Proposed Kaipara District Plan](#) (the proposed plan). Our submission is limited to issues impacting on quarrying.
3. The AQA is interested in the proposed plan because of the need to protect aggregate and other quarry materials from competing land use and future development of the district and its towns and communities, and to highlight its role in that development.

## General comments

4. Aggregate (crushed rock, gravel and sand) is an essential resource for the construction of roads, concrete, manufactured concrete building materials, asphalt and other products. It is also important for increasing resilience and adapting to extreme weather events and climate change. Due to increasing levels of construction and infrastructure development activity, there is a growing demand for aggregate across the country as well as in the Kaipara District.
5. We welcome the recognition in the **Overview of the Earthworks chapter** of the proposed plan that “Quarrying activities and mining activities are of considerable social and economic importance to the district and region, noting that aggregate is critical for construction and the provision of infrastructure.”
6. Aggregate is a finite resource. It can only be sourced from where it is physically located and where the industry is able to economically access it. There are limited opportunities to establish new quarries because of the ‘location specific’ characteristic of aggregate deposits.
7. It should also be noted that due to its weight and volume, aggregate is very expensive to transport. An additional 30km of travel typically doubles its cost. Quarries should ideally 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.

8. The AQA is a strong advocate for council planning across the country to identify where the rock and sand is located and to prevent sterilisation of those areas by new development, and alternative land uses, so that access to such resources is not lost.

## Comment on the plan

9. We have reviewed the sections and chapters of the proposed plan of relevance to us.

## Definitions

10. We support the definitions of '**Quarry**' and '**Quarrying Activities**' in the proposed plan which are taken from the National Planning Standards.
11. As well as the importance of being consistent with National Planning Standards definitions generally, these definitions work well for the quarrying sector as they encompass the wide range of activities involved with quarrying which are broader than just aggregate extraction. This is important as we discuss later in the submission in paragraph 15.
12. We support the definition of '**Primary production**', also taken from the National Planning Standards. The definition includes quarrying activities which is important as we set out later in the section on Highly Productive Land (from paragraph 24).
13. We note the definition of **Land-based primary production** is **not** taken from the National Planning Standards. It is defined as production, from agricultural, pastoral, horticultural, or forestry activities, that is reliant on the soil resource of the land. Because of the words 'soil resource', this definition is likely to exclude quarrying activities. We discuss why this matters in paragraph 25.

## Earthworks chapter

14. In the proposed plan, quarrying for aggregate activities (including gravel extraction) is addressed in the Earthworks chapter.
15. Even though a large component of quarrying activities involves earthworks, quarrying activities are significantly different from general earthworks and, consistent with the definitions in the Definitions section as discussed above, are much broader in scope, including ancillary activities such as processing (including crushing, screening, washing, and blending), transport, storage, sale and recycling of aggregates (clay, silt, rock, sand), the deposition of overburden material, rehabilitation, landscaping and cleanfilling of the quarry, and the use of land and accessory buildings for offices, workshops and car parking areas associated with the operation of the quarry.
16. For these reasons, we would prefer to see a separate, dedicated quarry chapter setting out the objectives, policies rules and standards for quarrying activities rather than incorporating them in the Earthworks chapter as outlined in the proposed plan.

## **New quarries in the General Rural Zone**

17. We support the provisions in **EW-P3** which enable quarrying activities to be undertaken in the General Rural Zone in “appropriate locations”. This term lacks specificity but we support it because it enables discretion and the opportunity for the quarry to demonstrate its appropriateness. We agree with the sentiment that there are places where quarrying is not appropriate due to its impacts.
18. There will be a need for new quarries throughout the district and many of them are likely to be located in the General Rural Zone. The plan also needs to be enabling for quarry development in other zones.
19. There needs to be a consenting pathway provided for quarrying with appropriate conditions given the location specific characteristics of aggregate resource.

## **Activity status in the General Rural Zone**

20. **EW-R4** provides a ‘Discretionary’ status for quarrying in the General Rural Zone. We recommend it should be changed to ‘Restricted Discretionary’. This more enabling activity status is justified given the location specific characteristics of aggregate resources, as outlined in the earlier section.
21. The matters for discretion to be used could include things like any adverse landscape and visual amenity effects of the quarrying and associated activities; any adverse traffic safety or amenity effects associated with the transportation of aggregate on any public roads, provided that any traffic safety effects of vehicles entering and exiting a quarry site may be considered; and any adverse effects on land values.
22. We note other district councils in New Zealand (for example Selwyn District Council) provide a Restricted Discretionary activity status for quarrying and the matters for discretion could come from those districts.
23. Any proposal would still have to use industry best practice and comply with a management plan.

## **Highly Productive Land**

24. **GRUZ-O1** says the purpose of the General Rural Zone is to enable primary production activities. We note that the definition of primary production includes quarrying activities.
25. **GRUZ-O3** protects highly productive land from inappropriate land use and it specifies land-based primary production, which is likely to exclude quarrying activities, as referred in the definitions section. **GRUZ-P1** restricts activities on highly productive land that are not reliant on the soil resource of the land. Again, this is likely to exclude quarrying activities.
26. Because the definition of primary production in the Definitions section includes **quarrying activities**, as it should, we interpret **GRUZ-O1** as providing quarrying activities with a consenting pathway on highly productive land.

27. We understand the intent of these provisions and the need to enable agriculture. However, we point out that extractive activities are the most productive of all primary production activities given the value of the aggregate resource. For these reasons, and due to its location specific characteristic as set out earlier, the inclusion of quarrying activity on highly productive land under certain conditions is appropriate.
28. The definition of highly productive land in the Definitions section of the proposed plan includes LUC 1, 2 or 3 land. We note the Government has announced Cabinet agreement to remove LUC-3 protections from the National Policy Statement for Highly Productive Land (NPS-HPL) and so this should be reflected in the Definitions section and elsewhere in the proposed plan.
29. We note there are likely to be further [amendments made to the NPS-HPL](#) as announced by the Minister for RMA Reform on 29 May. We recommend decisions made in this area of the proposed plan are consistent with this and that its finalisation is postponed until after the NPS-HPL decisions are finalised.

## Ecosystems and Indigenous Biodiversity chapter

30. There are references in the Ecosystems and Indigenous Biodiversity chapter to the national policy statements to protect indigenous biodiversity. Its not specified but this presumably means the National Policy Statement for Indigenous Biodiversity (NPS-IB). Like the NPS-HPL, referred above, this is shortly due to be amended as announced recently by the Minister for RMA Reform.
31. Again, we recommend the proposed plan is consistent with these changes and that finalisation of the proposed plan is postponed until after the NPS-IB changes are confirmed.

## Sand dredging

32. Sand dredging is an increasingly important activity in Kaipara and around the country to ensure supplies of sand for concrete manufacture and other uses are met. Alternatives to sand dredging are land extraction and manufactured sand and both are under pressure with constrained supplies around the country.
33. Sand dredging is currently occurring in the Kaipara Harbour to meet these needs. While it may not be occurring within the Kaipara District boundaries, it is important that the proposed plan allows for this activity as it shows the harbour is an important source of sand which may be accessed more widely in the future.

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