

Submission from the AQA to the Waikato Regional Council on the Proposed Waikato Regional Coastal Plan

November 2023

Introduction

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.

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.

We would like to thank the Environment Committee for the opportunity to make a submission on the [Proposed Waikato Regional Coastal Plan](#) (the Proposed Plan).

Key points

- We support the Proposed Plan in that it provides a consenting pathway for sand removal.
- The Proposed Plan strikes the right balance between allowing the removal of some sand for infrastructure and the need to protect the coast from the adverse effects.

Submission

The AQA has an interest in the Proposed Plan because of the increasing importance of sand as an industrial material. We have outlined the nature of this in later in the submission.

The Proposed Waikato Regional Coastal Plan

We have reviewed the Proposed Plan as it relates to sand extraction for industrial purposes, particularly Chapter 10, Disturbances and deposition.

We support the thrust of the Proposed Plan and consider it balances the need for sand for infrastructure and the need to protect the coast from the adverse effects of sand removal.

The Proposed Plan provides a consenting pathway for sand removal which we fully support. This provides applicants with an opportunity to make their case for extraction subject to conditions so providing mechanisms to protect coastal processes and ecosystems.

Where the sand is not in areas of outstanding natural character or significant indigenous biodiversity a Discretionary activity status is provided. We support this activity status for removal in areas other than those listed.

We also fully accept the protections that are provided those areas although we are not fully familiar with each of the areas specified within Schedule 4 – Outstanding natural character areas and Schedule 7A – Significant Indigenous Biodiversity Areas, and so can't comment on the appropriateness of all the areas in these schedules. But we support the principle of a higher hurdle for land in these coastal areas.

Importance of sand extraction

Aggregate (crushed rock, gravel and sand) is needed for the construction of infrastructure in New Zealand including roads and buildings. Sand in particular is used in all concrete and is particularly important in higher strength concrete mixes.

With the growing threats posed by sea level rise and increased storm activity, the use of marine sand and gravel to protect vulnerable communities and infrastructure around our coast will become increasingly important.

To give a picture of the quantities involved, it is estimated that just over 1,000,000 tonnes of sand was sold in the Auckland market in 2021. Of this, 720,000 tonnes was used for ready-mix concrete, 73,000 tonnes for pre-cast concrete, with a further 206,000 tonnes for other applications

Marine dredged sand and gravel resources for these purposes has occurred in New Zealand for more than 75 years. It is growing in importance particularly where local land-based aggregates are constrained, either because resources are not geologically present or because existing resources have become depleted.

It is also increasingly used where closer sources of aggregate material to major urban centres are not available. Because quarried products are high volume this contributes to pressures on roads, adds to congestion, increases emissions and adds to costs to the consumer. As a rule of thumb, an additional 30km travel typically doubles the cost of aggregate.

An alternative source of sand through crushing more rock and stone, is not available at scale yet in New Zealand. It relies on capital investments of tens of millions of dollars and if financially viable, will be some years until operational at scale.

Recommendation table

Provision		Recommendation
DD-O1	Protect coastal processes and ecosystems from disturbance, dredging or removal of natural material	Support
DD-P1	Recognise that dredging, disturbance and deposition activities may be necessary or beneficial: 1. For the continued operation of existing infrastructure;	Support
DD-R10	Removal of sand, shell, shingle or other material not within outstanding natural character or significant indigenous biodiversity areas Discretionary	Support
DD-R11	Removal of sand, shell, shingle or other natural material in any area of significant indigenous biodiversity or outstanding natural character not otherwise provided for Non-complying	Support
DD-R12	Prospecting, exploration or mining in areas of outstanding natural character or significant indigenous biodiversity Prohibited	Support

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