

Submission on the Illustrative National Policy Direction (NPD)

16 October 2026

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 importance of 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.

Thank you for the opportunity to provide this feedback on the illustrative NPD. We are generally supportive of the document, and make the following comments:

Key points of our submission

- 1) We submit that it is imperative the NPD direct the protection of existing quarries from non-compatible land use encroachment (for example housing and other development), reduce reverse sensitivity potential, and enable expansion and the development of new greenfield resources.
- 2) We submit that the current illustrative NPD fails to manage potential or real conflicts between the aim of protecting biodiversity (Theme 5: Public values), and that of enabling economic development. This must be addressed.
- 3) We submit that an NES for Quarrying is essential to provide guidance to decision makers with a simplified and consistent approach to dealing with quarrying activities. The NES for Quarrying should be included in national standards for land use plans.
- 4) We submit that all effects be dealt with using the established environmental effects management hierarchy: avoid, minimise, remedy, offset or compensate.
- 5) We submit that environmental limits must allow for the specific characteristics of different regions to be recognised, and the system for establishing these limits is flexible enough to cater for regional and ecosystem variations.
- 6) We submit that far greater use must be made of adaptive management plans in the NPD as a means of ensuring positive environmental outcomes are achieved.
- 7) We submit that Sub-Theme 4 Resources (quarrying, mining and waste) must be recognised as supporting Goal 11, 1 e) of the Planning Bill goals (Table 1).

General comments

New Zealand needs a secure supply of aggregate and quarry materials to enable affordable development of vital infrastructure and housing stock – both now and into the future. This will not be possible unless planning is streamlined, quarry resources are identified and protected to ensure a sustainable supply of vital construction materials, and quarry land is rehabilitated to ensure ongoing viable use and to provide valuable community open spaces, productive land and assets once extraction is complete.

The AQA supports the intent of the Illustrative NPD, particularly the intent within the planning system to protect activities that were lawfully established so they can continue to operate over time without unreasonable constraint.

Quarries provide important benefits to the communities they operate within, the wider region, and to the country's economy. It is imperative that local authorities are directed to spatially recognise and protect key resource areas and enable their development in order to both protect existing quarries from encroachment of non-compatible land uses such as housing and development, reduce reverse sensitivity potential, and to enable the expansion of these resources and development of new greenfield resources.

We support the establishment of zoning and buffers to separate and manage incompatible land uses (for example ensuring setbacks to established quarries or quarry owned landholdings).

We firmly believe an NES for Quarrying is essential. It will ensure simplified and consistent guidance is provided to permitting decision makers, supporting how they approach and consider quarrying permits. The NES for Quarrying should be included in national standards for land use plans. An NES for Quarrying will establish nationally consistent and proportionate rules for quarries, and ensure certainty for operators, helping reduce the compliance burden they currently face.

The terminology used within the Illustrative NPD must be consistent with the definitions and terminology used in the National Planning Standards and existing National Policy Statements and National Environment Standards (for example 'aggregate extraction' Theme 3: Primary Production, Sub-theme 1 PP-Directive 1.1). Using consistent language will avoid the confusion and misalignment that has hampered development of National Direction in the past.

Goals of the Planning Bill

In general, we support the proposed goals for the Planning Bill. We do, however, believe that Theme 4 Resources – quarrying, mining and waste is recognised as contributing to Planning Bill goal e) "To enable infrastructure to be provided to meet and respond to current and future demand". Infrastructure cannot be delivered without an adequate supply of aggregate and the goals must reflect this.

Theme 4: Resources – quarrying, mining and waste

Sub-theme 1 (Quarrying and mining)

RW – Directive 1.1 (a)(i) – Quarrying, mining and associated infrastructure, activities and operations are to be enabled "in identified locations". We are concerned that regional

planning committees are not best placed to identify where these locations should be. We consider it highly likely that insufficient areas will be identified, inappropriate areas may be identified, and legitimate sites outside these areas may become more difficult to access for future aggregate extraction (by omission).

We suggest the Directive should simply enable extraction at locations where suitable aggregates exist. The Aggregate Opportunity Modelling (Mapping) completed by Earth Sciences can provide regional planning committees with the technical information they need to ensure that zoning or spatial layers do not preclude quarrying activities in areas of high potential.

RW – Directive 1.1(b) – This directive requires the avoidance of “unreasonable effects”, which is not defined in the document, and we consider it is unnecessary. We suggest that all effects be dealt with using the established environmental effects management hierarchy: avoid, minimise, remedy, offset or compensate. Existing National Direction already reflects this hierarchy, and it should be adopted for consistency in the NPD.

RW – Directive 1.1(c) – The directive is enabling, subject to “environmental limits”. It is important that environmental limits allow for the specific characteristics of different regions and the system for establishing these limits is flexible enough to cater for regional and ecosystem variations. Given the new system is heavily dependent on the development of national instruments, it will be important that limits are set with a strong scientific basis.

RW – Directive 1.4(c) – Known “significant mineral resources” are to be prioritised where conflict between housing, development and mineral resources occur. We fully support this, alongside the establishment of buffer zones or offsets to protect such extractive sites and zones from reverse sensitivity.

Managing conflicts between land uses

Quarrying is a temporary land-use activity. After closure, quarried land can be returned to its former use, or is repurposed for a new or enhanced use, including fertile grazing land, high value primary production land, or native vegetation. In Marlborough, for example, quarried land in Renwick is now used for grape growing and wine production.

Throughout the Illustrative NPD, the directives enable a range of activities including housing development, infrastructure and primary production. It is highly likely any potential quarrying activity may conflict with these activities, but there is insufficient direction on how potential competing land-use proposals should be resolved. Part 2 of the Planning Bill, clause 12 “Relationship between key instruments in decision-making” devolves this to the local decision maker, much like the status quo of the Resource Management Act. We consider this issue needs to be carefully considered and clarified, potentially within spatial planning.

We are also concerned that the Illustrative NPD fails to manage potential or real conflicts between the aim of protecting biodiversity (Theme 5: Public values), and that of enabling economic development. This issue needs to be resolved within the NPD, to guide national standards.

Adaptive management plans

Spatial planning should help manage competing land uses and support long-term resource availability and flexibility. To assist this, National Standards will establish nationally consistent

and proportionate rules to provide certainty for operators and reduce the approvals burden they currently face.

Although provided for in the Natural Environment Bill, greater use should be made of adaptive management plans in the NPD as a means of ensuring that appropriate, timely and positive environmental outcomes are achieved.

Embedding management plans within permits will enable the consenting authority and permit holder to ensure outcomes are achieved by providing a more agile approach when thresholds of effects on the receiving environment need to be adjusted.

Regular reviews of these plans will ensure that consequences on the environment that were not anticipated during the permitting process can be addressed quickly, rather than relying on a protracted process for the review of consent conditions.

Conclusion

Our members produce 48 million tonnes of aggregate and quarried materials each year. This product is fully consumed in New Zealand each year, underpinning how communities are built, connected and maintained.

While we are generally supportive of the Illustrative NPD, and appreciate the opportunity to provide our feedback, we advocate strongly for clearer direction on how land use conflicts are to be resolved.

We look forward to continuing to assist in this work.

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