

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Clevedon Quarry Expansion
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1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Ngāti Tamaoho Settlement Trust		
*First name	Hauauru		
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*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
Please see comments attached.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Hauauru Rae

Strategic Advisor to the Chief Executive

Date: 14 June 2026

15 June 2026

Ministry for the Environment
Attention: Whitney Nelson

referral@fasttrack.govt.nz

Comments on the application for referral of the Clevedon Quarry Expansion project under the Fast-track Approvals Act 2024

Ko Te Mānukanuka o Hoturoa te moana

Ko Tainui te waka

Ko Mangatangi, Whātāpaka me Ngā Hau e Whā ngā marae

Introduction

1. These comments have been prepared by the Ngāti Tamaoho Settlement Trust (the Settlement Trust). As the post-settlement governance entity for Ngāti Tamaoho, the Settlement Trust was established to advocate for the rights and interests of Ngāti Tamaoho. We welcome the opportunity to make comments on the application for referral of the Clevedon Quarry Expansion project (the Project). The application is by Stevenson Aggregates Limited (the Applicant).

Background to Ngāti Tamaoho

2. Ngāti Tamaoho descend from the first peoples of Tāmaki Makaurau. And, since the arrival of our tūpuna – the earliest inhabitants of this land who formed groups, including Te Tini o Toi, Ngā Oho, Ngā Iwi, Ngā Ririki – we have exercised rangatiratanga across our takiwā. Our tūpuna also included members of the Tainui waka, including Taikehu, Poutūteka and Rakataura. We are the descendants of the union of these great peoples, brought together under the leadership of our eponymous tupuna, Tamaoho. And the whenua, including Te Mānukanuka o Hoturoa (Manukau Harbour), Āwhitu and Te Pūaha o Waikato, is our takiwā.

3. Our tūpuna never ceded sovereignty. Our people were once prosperous. Since prior to 1840, our tūpuna sought to develop commercial relationships with Pākehā settlers by entering into land transactions with them and the Crown. However, in 1863, Ngāti Tamaoho were unfairly labelled as ‘rebels’; their homes were burned and looted, they were evicted from their settlements, and their remaining land was confiscated. By 1900, our tūpuna were virtually landless, leading to generations of Ngāti Tamaoho suffering severe deprivation, which was further compounded by environmental degradation in service of regional growth over which Ngāti Tamaoho had no control over.
4. Our tūpuna never gave up on re-establishing our mana, within ourselves and across our takiwā. Since the middle of the nineteenth century, Ngāti Tamaoho has sought redress for its historical grievances with the Crown. That journey culminated in the realisation of the Waikato Raupatu Claims Settlement Act 1995, the Waikato River Settlement Act 2010, the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014, and the Ngāti Tamaoho Claims Settlement Act 2018. These instruments frame the contemporary relationship between Ngāti Tamaoho and the Crown and provide important context for how projects within our takiwā must be approached.
5. Ngāti Tamaoho has a strong relationship with the Project area and the wider cultural landscape in which it sits. The Clevedon Quarry Expansion is located on the north-western edge of Te Hūnua/Kohukohunui, within the upper Wairoa River Valley, and the referral material acknowledges that the Wairoa Gorge Scenic Reserve downstream of the site is of significance to our iwi. The referral drawings also identify a wider Treaty settlement context relevant to Ngāti Tamaoho. In this setting, the site and its streams, ridgelines, vegetation, downstream receiving environments, and surrounding landscape cannot be understood as isolated biophysical components; they are part of an interconnected cultural environment central to identity, memory, and kaitiakitanga.

Comments

6. As mana whenua with longstanding cultural, historical, and spiritual connections to Clevedon and its surrounding area, we approach our engagement with the Project through a commitment to ensuring that development occurs in a manner that protects the mauri of te taiao and the relationship of our iwi with te taiao. We acknowledge that the Applicant has framed the Project as one of regional significance, directed toward maintaining long-term aggregate supply for Auckland and surrounding growth areas. However, the presence of asserted regional benefit does not diminish the need for robust scrutiny of cultural, ecological, freshwater,

and landscape effects, particularly where those effects are long-term, staged, and in some cases permanent.

7. We anticipate that the Project, if placed onto the fast-track and subsequently approved, would interact with an already sensitive landscape and receiving environment, including streams, tributaries, ecological areas, and the wider Wairoa catchment. Our concerns centre on four matters:
 - 7.1. the relationship of Ngāti Tamaoho with the wider cultural landscape and te taiao;
 - 7.2. freshwater systems, including stream reclamation, groundwater take/diversion, and baseflow depletion;
 - 7.3. indigenous vegetation, significant ecological areas, and protected fauna; and
 - 7.4. the adequacy of the approvals framework, long-term adaptive management, and the extent to which Ngāti Tamaoho's views must shape the Project over its approximate 50-year life.

The relationship of Ngāti Tamaoho with the wider cultural landscape and te taiao

8. The landscape surrounding Clevedon Quarry is not merely a site for extraction. It is part of a broader cultural environment that carries layered values arising from whakapapa, occupation, movement through the landscape, and long-standing relationships with wai, whenua, and indigenous ecosystems. The referral material records the site's location within the upper Wairoa River Valley, the wider SAL landholdings across 546 McNicol Road, 646 McNicol Road, and 439 Otau Mountain Road, and the proposed expansion of the quarry south-eastward across approximately 75 hectares, together with an overburden disposal area. Over time, that expansion will progressively reshape the foothill landform, remove and modify streams, and extend beyond the Special Purpose – Quarry Zone into the Rural Production Zone and Significant Ecological Area. From our perspective, these changes are not merely visual or technical; they are changes to the integrity of a living cultural landscape.
9. The referral report states that no archaeological sites are recorded within the expansion footprint and that no archaeological features were observed during survey. However, the absence of recorded archaeology does not equate to the absence of cultural value, nor does it remove the need for tikanga-consistent safeguards during earthworks and expansion. Cultural landscapes are not defined solely by mapped sites. We therefore expect that, if the Project proceeds, it is supported by iwi-centred accidental discovery protocols, cultural monitoring at

key disturbance stages, and practical mechanisms enabling Ngāti Tamaoho to be present where works intersect with areas of heightened cultural and environmental sensitivity. In a fast-track context, those matters should not be deferred into generic post-referral processes without clarity as to how they will be secured and resourced.

Freshwater systems, including stream reclamation, groundwater take/diversion, and baseflow depletion

10. Freshwater effects are among the most significant issues arising from this referral application. The Applicant's own material identifies the permanent loss and modification of approximately 2.3 kilometres of intermittent and permanent stream habitat, with preliminary freshwater ecological assessment concluding that permanent stream habitat loss/modification is expected to result in a high to very high overall level of effect requiring offset and/or compensation. The proposal also includes stream reclamation, groundwater take and diversion, stream augmentation, stormwater treatment infrastructure, and works affecting overland flow paths and flood-prone areas. These are not peripheral matters; they go to the heart of the Project's environmental acceptability and to the health of the wider receiving environment.
11. The referral material indicates that quarry dewatering may reduce baseflow contributions to three streams and their tributaries draining to the Wairoa River, and that stream augmentation is proposed as a practical mitigation response where feasible. While stream augmentation may form part of an effects management hierarchy, the referral material remains preliminary and does not yet provide the level of detail that would be required to understand whether augmentation will be practicable, effective, durable, and ecologically appropriate over time. In our view, any substantive application must clearly articulate the baseline hydrology, the predicted depletion profile by stream and stage, the trigger framework for augmentation, and the ecological consequences if augmentation is ineffective or cannot be maintained. These matters are especially important in a 50-year staged extraction context, where hydrological effects and site conditions will evolve materially over time.
12. We note that DOC's pre-lodgement comments identify potential impacts on multiple freshwater streams and habitats, including likely effects on at-risk fish species, and expressly state that complex freshwater fisheries approvals may be required. DOC further notes that, if such approvals are needed, they should be included at referral stage because they cannot later be introduced as a new approval type within the substantive application if omitted from the referral

decision. That observation is significant. It indicates that, even at referral stage, there remains uncertainty as to whether the Project's approval pathway has been fully and correctly identified. From our perspective, a project involving permanent stream loss, freshwater habitat disturbance, fish relocation, and streamflow alteration should not proceed through referral on the basis of incomplete approval framing.

13. From a kaitiakitanga perspective, protection of freshwater systems cannot be satisfied by broad statements of future mitigation alone. We expect that any substantive application will include a comprehensive freshwater ecological assessment, a baseflow monitoring programme, fish passage and fish relocation methodologies, clearly defined augmentation and contingency measures, and a structured offset/compensation package that is ecologically robust, geographically relevant, and supported by enforceable and timebound delivery obligations. Where the Applicant relies on 'no net loss' or 'positive biodiversity gains' language, the basis for those claims must be transparent, measurable, and independently verifiable.

Indigenous vegetation, significant ecological areas, and protected fauna

14. The proposal also raises material concerns in relation to terrestrial ecology. The referral documentation identifies the removal of approximately 6.7 hectares of indigenous vegetation and fauna habitat, including vegetation within the Significant Ecological Area overlay (SEA_T_5588), and records that the residual effect associated with native vegetation loss remains high, requiring offsetting. The expansion is proposed to encroach into SEA_T_5588 during later stages and to involve associated fauna management measures, restoration planting, pest control, and offset/compensation arrangements. While the Applicant frames these effects as manageable, the scale and duration of the proposed vegetation and habitat change is substantial.
15. The Project's fauna values are also significant. The referral report identifies Hochstetter's frogs, long-tailed bats, native fish species, and other ecological values associated with both terrestrial and freshwater habitats. DOC's engagement material goes further, noting that the project is likely to affect multiple freshwater habitats and that further work is needed in relation to frogs, bats, lizards, birds, fish, wetlands, offsetting and compensation, and long-term monitoring and adaptive management. DOC also states that some impacts on wildlife are not expected to occur until decades into the life of the Project, which raises real questions as to whether it is appropriate or even available to seek certain wildlife approvals now for activities far in the future.

16. These issues are especially important in the context of fast-track referral because the Project is being advanced at a stage where the applicant itself advised Auckland Council that, aside from the economics assessment and the referral report, no other independent technical reports or memoranda were being lodged at referral stage. That may be sufficient for a high-level referral application in some cases, but where a project involves permanent stream loss, indigenous vegetation removal, threatened or at-risk species, and long-term staging across 50 years, Ngāti Tamaoho considers that the absence of more developed technical material increases the risk that key ecological matters are being deferred rather than resolved. Referral should not function as a mechanism for compressing scrutiny of significant residual ecological effects.
17. Our expectation is therefore that any substantive application, if the Project is referred, must include fully developed ecology reporting, fauna management plans, monitoring methodologies, offset/compensation design, and draft consent conditions that are sufficiently specific to enable genuine assessment. We also expect that restoration, pest control, replacement planting, and offset delivery are not framed as broad future aspirations but are instead secured through clear standards, milestone timing, reporting obligations, and long-term stewardship commitments that survive well beyond initial works.

Adequacy of the approvals framework, long-term adaptive management, and project governance

18. A notable feature of this Project is its timeframe. The Clevedon Quarry Expansion is proposed as a five-stage project extending over an approximate 50-year period. That duration materially affects how adverse effects must be assessed and managed. Conditions, management plans, and mitigation responses that may appear adequate in principle at referral stage may not remain fit-for-purpose over several decades of changing technology, ecological condition, hydrology, climate, land use, and operational practice. The Project therefore requires a governance and management framework capable of genuine adaptive management, stage-specific review, and repeated validation that assumptions made early in the project life remain valid later on.
19. DOC's pre-lodgement commentary makes this point in practical terms in relation to wildlife approvals, noting that DOC does not typically issue Wildlife Act approvals for more than ten years at a time and that future approvals for activities 25–50 years away present a novel and unresolved issue. That observation should not be treated as a minor technicality. It goes to the extent to which the current referral application has properly framed the Project's future approvals needs, and

whether the Project can reasonably be said to be sufficiently developed in approval architecture for referral. It also reinforces the need for repeated review points and for management plans that can be updated in response to monitoring, ecological change, and stage progression, rather than being fixed once at the outset.

20. Ngāti Tamaoho also notes that Auckland Council's pre-lodgement comments highlighted adverse effects, ineligible activity issues, regional benefit claims, groundwater take/dewatering, and existing consent interactions as central matters likely to arise in referral review. In our view, that reinforces the point that this is not a simple extension of an existing activity. It is a significantly enlarged and reconfigured quarry proposal with material freshwater, ecology, and landscape consequences, together with the variation of existing consents and the need to ensure that the full approvals package has been accurately identified. Any decision to refer the Project should not dilute the scrutiny that such a proposal would ordinarily attract.

Expectations for how Ngāti Tamaoho's views should inform the Project

21. Our views should inform the Project in a manner that goes beyond consultation and is demonstrably reflected in decision-making, design choices, conditions, and on-the-ground delivery. This expectation is grounded in kaitiakitanga, in the need for genuine partnership, and in the recognition that projects within our takiwā must do more than acknowledge mana whenua interests in principle. They must integrate those interests into the substance of the project's approval and delivery framework. In practical terms, this means that Ngāti Tamaoho's views on cultural landscape protection, freshwater management, ecological restoration, offsetting, and long-term stewardship must be translated into enforceable and timebound requirements rather than left to broad future discretion.
22. We expect that any substantive application arising from referral will include meaningful roles for Ngāti Tamaoho in cultural monitoring, review of key management plans, and oversight at stages of highest potential impact, including initial establishment works, stream-related works, vegetation clearance, and stage transitions. We also expect contractor inductions, accidental discovery procedures, and environmental management plans to embed tikanga-consistent requirements from the outset, and for monitoring and reporting frameworks to be sufficiently robust that issues are identified early, escalated appropriately, and rectified without delay. In a project of this scale and duration, those are not optional enhancements. They are practical safeguards necessary to maintain

confidence that cultural and environmental commitments will be honoured over time.

23. Finally, our relationship with the Project does not end at the granting of approvals, nor at the completion of any one stage of extraction. Long-term stewardship is essential. We therefore expect an ongoing commitment to partnering with our iwi on the rehabilitation of the land, including through ecological restoration, monitoring, replacement planting where required, management plan review, and continual improvement throughout the life of the Project. If unforeseen effects arise, the governance framework must enable those effects to be identified, discussed with our iwi, and addressed in a timely and meaningful way. Any project that proposes to occupy this landscape for half a century must be structured on the basis of enduring accountability, not short-term compliance.

Conclusion

24. In the interests of creating the space for engaging further with the Applicant on that assessment, we have intended to set out the elements above that we anticipate will need to be considered as part of our ongoing engagement with the Project. These comments do not seek to constrain the scope of that engagement.
25. However, given the scale, duration, and acknowledged residual effects of the Project – including permanent stream loss, indigenous vegetation removal, and unresolved questions regarding the full approvals pathway – we consider that any decision to refer the Project must be approached with caution and must not reduce the expectation that the substantive application fully addresses these matters in a comprehensive, transparent, and culturally informed manner.
26. If the Project is referred, we expect that the substantive application will contain a complete and properly framed approvals package, full technical material, robust draft conditions, and a delivery framework that gives genuine effect to kaitiakitanga, protects the mauri of te taiao, and enables Ngāti Tamaoho to remain meaningfully involved throughout the life of the Project and beyond.