



23 September 2025

Environmental Protection Agency
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Email: substantive@fasttrack.govt.nz

Tēnā koe,

Re: Drury Quarry Expansion Fast-Track Application – Te Ākitai Waiohūa comments

Te Ākitai Waiohūa Settlement Trust (TAWST) welcomes the opportunity to provide comment on the substantive application by Stevenson Aggregates Limited (SAL) for approval of resource consents, archaeological authority, and wildlife permits under the Fast Track Approvals Act (the Project).

1. Te Ākitai Waiohūa Structure

Te Ākitai Waiohūa operates incorporated societies that aim to promote and support kaitiakitanga as well as cultural and environmental values with regard to the wider needs of the community. These not-for-profit tribal organisations represent Te Ākitai Waiohūa in matters relating to the environment, sustainable resource management, education and the protection of wāhi tapu as well as advocate and uphold Te Ākitai Waiohūa cultural values and interests as Mana Whenua. Waiohūa are the tangata whenua of this region who traversed their tribal domain (rohe) in a seasonal cycle of shared harvesting, gathering and fishing.

TAWST is the main representative iwi entity that has an interest in resource management projects in the rohe with regard to redress received for settling Te Ākitai Waiohūa historical claims. An example of this includes vesting of ownership and co-management of the remnant maunga or volcanic cones of Auckland with the Ngā Mana Whenua o Tāmaki Makaurau Collective, of which the TAWST is a member.

These comments are provided by TAWST but represent the views of Te Ākitai Waiohūa including its kaitiaki organisations.

2. Cultural Values Assessment

Te Ākitai Waiohūa provided a Cultural Values Assessment (CVA) for the Project in three stages:

1. High-level CVA setting Te Ākitai Waiohūa relationships and associations with the area
2. Addendum CVA responding to the original proposal for a four-stage expansion
3. Addendum CVA responding to the fast-track draft proposal for a five-stage expansion



In preparing a CVA the main interests of Te Ākitai Waiohū are set out:

- The recognition and acknowledgment of Te Ākitai Waiohū and its history in Tāmaki Makaurau (Auckland);
- The opportunity for Te Ākitai Waiohū to exercise its role as Kaitiaki in Tāmaki Makaurau;
- The ability for Te Ākitai Waiohū to protect and preserve its interests, resources and taonga in Tāmaki Makaurau.

The Project sits in the middle of a series of significant sites to Te Ākitai Waiohū, based around the natural maunga and waterways of the wider region. Te Ākitai Waiohū have a strong spiritual (Taha wairua) association with the land, which provides its people with a sense of meaning, connection and purpose. Drury is a region of significance to Te Ākitai Waiohū that provided access to the Manukau Harbour and its wealth of natural resources.

Te Ākitai Waiohū is not against development. However, when development occurs, the expectation is for restoration and enhancement of te taiao to restore the mauri and leave it in a better state than it was before the development occurred. This is particularly important where development creates adverse effects; the mitigation and remediation must be commensurate with the impacts of development.

3. Engagement on the fast-track application

Te Ākitai Waiohū acknowledges the ongoing engagement by SAL since 2022, when consultation started on the proposal to expand the quarry into the Sutton Block. The record of engagement and summary of key concerns are a generally accurate reflection of previous feedback provided by the iwi.

Te Ākitai Waiohū acknowledge and appreciate the resourcing of a planning consultant to assist with the review of the original application and the draft fast-track application prior to lodgement. The scale of the Project and the timeframe for comments make it very difficult for iwi to engage with the application material meaningfully. It should be noted that Te Ākitai Waiohū and TAWST is invited to make comments on several other applications under the FTAA at the same time, affecting our limited capacity.

TAWST submitted in opposition to the Fast Track Approvals Bill 2024 (FTAB) because of the heavy emphasis on development over te taiao environment and the effects on Te Ākitai Waiohū customary rights, interests and responsibilities including iwi Tiriti o Waitangi settlement interests, and the ability for Te Ākitai Waiohū to exercise mana motuhake and kaitiakitanga within Tāmaki Makaurau. A key concern was the lack of time for Te Ākitai Waiohū to properly consider or scrutinize projects listed in Schedule 2.

The Te Ākitai Waiohū submission to the FTAB opposed the 'listed projects' bypassing the referral process and the inability to comment on them because they were not included in the Bill and underwent a separate process with no public input. This process created a 'loophole' for listed projects, allowing projects to take place in areas deemed ineligible or inappropriate and without Mana Whenua consultation.

4. Comments

Te Ākitai Waiohū understands that the applicant amended the Project via a memorandum dated 25 August 2025, in response to comments from Auckland Council referring to the amended proposal and updated condition set.

As stated in our CVA addendum, Te Ākitai Waiohū opposes in principle the proposed activity of quarrying as it will have significant adverse cultural effects that cannot be avoided or fully mitigated.

When consultation with Te Ākitai Waiohū began, the Project was divided into four stages. Subsequently, the applicant chose to utilise the FTAA, and the Project was included in Schedule 2 listed projects as 'Drury Quarry Expansion – Sutton Block', to develop a quarry in stages over a 50-year period. Te Ākitai Waiohū is concerned about the increased scale of impacts from the additional fifth stage of quarry expansion.

The addition of a fifth stage to the Project is identified as providing 50 years of aggregate supply, which is the same as the original four-stage proposal, although significantly more aggregate will be made available (250m tonnes instead of 149m tonnes). Higher aggregate demand is now identified. The fifth stage of the Project results in significantly greater impact on te taiao (particularly loss of streams, indigenous vegetation and habitat), but no additional positive benefits are identified.

The economic assessment identifies savings of \$29.4m per million tonnes of aggregate based on reduced transport, emission, and social costs, generating significant economic benefits for the region and New Zealand. However, these cost savings are the same as those identified for the original four-stage proposal. The economic assessment does not address the increased environmental impacts as a cost of the Project.

Table 1 below provides a comparison between the original proposal and the Project to demonstrate the increased environmental impacts compared to the benefits that have stayed the same.

Table 1 Comparison between the original proposal and the Project

	Original application (4 stages)	Current application (5 stages)
Size	90ha	108ha
Mixed Rural Zone	10ha	30ha
Stream reclamation	2,643m	3,341m
Wetland reclamation	18,758m ²	18,758m ²
Indigenous vegetation	9.74ha (7.4ha SEA) • 0.65ha rock forest • 4.18ha broadleaf podocarp • 4.9ha kānuka	16.73ha (14.25ha SEA) • 0.65ha rock forest • 7.33ha broadleaf podocarp • 8.8ha kanuka
Economic benefits	Cost savings \$29.4m per million tonnes • \$8.9m in transport costs • \$19.9m in environmental costs • \$0.6m in social costs	Cost savings \$29.4m per million tonnes • \$8.9m in transport costs • \$19.9m in environmental costs • \$0.6m in social costs

4.1 Cultural values

The proposed activity of quarrying will have significant adverse cultural effects because the impacts on the whenua, awa and ngāhere cannot be avoided, remedied or fully mitigated. However, Te Ākitai Waiohū acknowledges measures undertaken to avoid impacts on Kaarearea Pā, which are supported.

There are no Statutory Acknowledgement Areas within the Project site area because it is privately owned land. However, there are several Statutory Acknowledgement Areas and statements of association from the Te Ākitai Waiohū Treaty settlement in the vicinity of the site and offsite mitigation land at Tuakau reflecting the historic occupation of this area by Te Ākitai Waiohū including:

- Cameron Town Historic Reserve
- Drury Conservation Area
- Drury Creek Recreation Reserve
- Mangatāwhiri Forest Conservation Area
- Paparimu Conservation Area
- Raventhorpe Conservation Area
- Raventhorpe Scenic Reserve
- Richard Sylvan Memorial Scenic Reserve
- Te Ia
- Te Maketu Historic Reserve
- Vining Scenic Reserve

Kaarearea Pā and nearby Te Maketū Pā were part of a complex network of settlements through the Hunua ranges fed by local waterways and valleys, contributing to a Te Ākitai Waiohū cultural landscape and demonstrating historic occupation and use of the Project site and its surrounds for hundreds of years.

Like many sites of significance in Tāmaki Makaurau, sections of Kaarearea Pā or Pou Hotiki have been heavily modified over time leaving remnants of a former hilltop settlement that still contains urupa (burial grounds) and koiwi (human remains.) As a cultural landscape, Kaarearea Pā was one of a number of settlements that make up Te Maketū all of which served slightly different purposes in the same region. All of these settlements were close to Te Ararimu, a long and busy travel route that connected the area with Pukekōiwhiri (Red Hill Papakura) and the Hunuas in the north and Mangatāwhiri, Pokeno and the Waikato in the south.

Te Ākitai Waiohū supports conditions that seek to recognise cultural values including providing for:

- Preparation of a cultural management plan
- Development of cultural monitoring procedures
- Mana Whenua taking and using native trees felled
- The ability to comment on draft management plans
- Copies of annual freshwater monitoring data being provided to Mana Whenua upon request
- Access to Kaarearea Pā subject to health and safety requirements.

Te Ākitai Waiohū does have concerns with draft Condition 7. While providing opportunities for Mana Whenua to be involved as a means to mitigate adverse effects on cultural values, this draft condition lacks clarity and timeframes. It does not specify what the applicant is

required to do to avoid, remedy or mitigate adverse effects on cultural values. Given the long timeframe of the Project, it is important to establish a clear and ongoing role for Mana Whenua.

Further discussion is sought to amend conditions to address the following matters:

- The consent holder must consult with Te Ākitai Waiohū
- At least 6 months prior to commencement of construction activities the consent holder must invite Mana Whenua to prepare a Cultural Management Plan
- Tikanga will be observed through a blessing of the land prior to each stage of works commencing
- Ecological Management Plan and sub-plans must be developed in consultation with Mana Whenua given the significant impacts on ecology

Draft Condition 10 requires management plans to summarise comments received from Mana Whenua, and to identify where they have been incorporated and where not, the reasons why. While this approach is supported, Te Ākitai Waiohū seeks greater involvement in the development of management plans, particularly the Ecological Management Plan and sub-plans as these are essential to ensure that the adverse environmental impacts are sufficiently mitigated and te taiao is restored and enhanced.

4.1.1 Archaeological remains of Māori origin

Te Ākitai Waiohū understands that an archaeological authority under the New Zealand Heritage Pouhere Taonga Act (NZHPT) is being sought for stage 1 earthworks due to their proximity to recorded archaeological sites R12/278 and R12/723 and the potential for unrecorded subsurface sites.

Given the significance and historical occupation of Kaarearea Pā, further discoveries are likely, and Te Ākitai Waiohū does not support reliance on the NZHPT authority process. Recording information on archaeological discoveries does not mitigate adverse effects on cultural values caused by the destruction of archaeological sites.

Te Ākitai Waiohū does not support conditions referencing the accidental discovery rules in the Unitary Plan E12.6.1. Specific Accidental Discovery Protocols should be agreed with Mana Whenua and set out in the conditions. With the current reforms and timeframe of the consents, there will be a new plan(s) with different rules and references. It will also be necessary for an agreed protocol to address tikanga Māori specific to the site.

The provision for cultural monitoring to be undertaken at the commencement of works in Draft Condition 7 is acknowledged. Provisions should also be included for the cultural induction of contractors prior to any earthworks commencing.

Te Ākitai Waiohū acknowledges that the archaeological authority under the NZHPT Act is only sought for stage 1, which is 0-3 years. The duration of the archaeological authority is expected to reflect the timeframe for stage 1. Future stages may also require authority prior to works commencing, and Te Ākitai Waiohū requests that any archaeological information gathered during previous stages be shared with Te Ākitai Waiohū prior to applying for future stages.

4.1.2 Ecology and biodiversity

The biodiversity within the site, including indigenous vegetation and habitats, waterways and wetlands, all contribute to the cultural landscape as they are an inseparable part of iwi

whakapapa and identity. They are a fundamental part of what drives the very existence of Te Ākitai Waiohū.

The objectives of the National Policy Statement on indigenous biodiversity (NPS-IB) require no overall loss in indigenous biodiversity across Aotearoa. The loss of significant indigenous vegetation and significant habitats of indigenous fauna in significant natural areas (SEA) is to be protected by avoiding or managing adverse effects. Te Ākitai Waiohū acknowledges the exception provided for aggregate extraction where there is a functional or operational need to be in a particular location. It is understood that under the FTAA, national policy statements and national environmental standards must be taken into account.

Te Ākitai Waiohū recognises that the application applies the effects management hierarchy of the NPS-IB to ensure that any significant residual adverse effects are offset or compensated to achieve an overall net gain:

- Offset residual adverse effects from loss of rock forest, kanuka forest, podocarp forest and relict trees through replacement planting (recognising that loss of 130 individual mature trees that have ecological value as sources of seed for regeneration and potential sources of food and nest/roost sites for mobile native fauna)
- Offset and compensation enhancement through pest control within enhanced habitats, including maintenance, monitoring and legal protection of retained vegetation
- Compensation of significant residual adverse effects (revegetation and pest control) on lizard habitat because mitigation is not 'like-for-like' due to the existing maturity of ecosystem types being removed (older than 30 years)

The amount of indigenous vegetation and habitat, especially within Significant Ecological Areas (SEA), affected by the Project highlights a significant impact on the cultural landscape and values of Te Ākitai Waiohū. Residual adverse effects that cannot be avoided, remedied or mitigated are proposed to be offset or compensated. It is our preference that offsite mitigation occurs on the site or within the immediate environs of the area of impact.

Te Ākitai Waiohū is concerned with the increased impact on indigenous vegetation and habitats from the fifth stage of the Project and is not satisfied that the impacts are sufficiently avoided, remedied or mitigated. The proposed restoration and enhancement planting throughout the Drury Quarry site, as well as the protection of remaining ngāhere and pest management, is acknowledged but does not compensate for the loss. It is acknowledged that some of the SEA is located within an area zoned for quarrying, but the Project expands the quarry beyond the Special Purpose Quarry Zone into the Mixed Rural Zone.

Ngā Motu o Hingaia (Drury Creek Islands) was identified as a potential offsite mitigation site but was originally discounted because it had no streams or wetlands. However, it was subsequently progressed as an option when the fifth stage was introduced as compensation mitigation because it would not be 'like-for-like'. In principle, Te Ākitai Waiohū supports the restoration and enhancement of Ngā Motu o Hingaia because it is within the site's catchment.

The amended proposal removes the restoration planting on Ngā Motu o Hingaia and no additional offset planting is considered by the applicant, although there will be some reduction in ecological gains previously identified as part of the Project.

Te Ākitai Waiohū seeks that offset mitigation at Ngā Motu o Hingaia be retained as an option to ensure that additional compensation mitigation is achieved for the added effects of stage 5. Conditions could identify that an alternative location must be identified if landowner approval is not provided. Given that the applicant no longer considers offsite mitigation as a

requirement, it should not be an issue to undertake the work in good faith without landowner approval at this time.

Draft conditions 52-54 require 'net gain' to offset loss of vegetation and habitats, and are supported in principle as they provide clear expectations and requirements. However, Te Ākitai Waiohūa is concerned about the reduced 'net gain' benefits. The reduced offset planting target for kānuka from 22ha to 17.6ha is not supported because of the increased impacts on kānuka from stage 5.

It is not adequate to rely on conditions that require a 10-year review of biodiversity offset to assess whether modelled targets are being met and then to enable additional offset planting if the targets are not being met. Review conditions are supported by Te Ākitai Waiohūa but not to determine whether sufficient mitigation is achieved.

Te Ākitai Waiohūa supports buffer planting of newly created edges in addition to any offset mitigation planting, monitoring of planting for 5 years, using monitoring information to assess the effectiveness of ecological enhancements as well as restoration and enhancement measures for the remaining forest areas, including through pest control, to improve local connectivity and ecological values.

Draft Condition 98 requires restoration planting to be implemented in the planting season immediately following the completion of staged vegetation removal works, but only lists stages 1-3 (30 years). It is assumed that this is because the consent duration is 35 years and therefore conditions cannot require implementation beyond that timeframe. Te Ākitai Waiohūa does not consider it appropriate to approve the Project for 5-stages, when new consents will be required after 35 years and additional stages could be included then.

4.1.3 Streams and wetlands

Te Ākitai Waiohūa reasserts that the mauri of wai must be maintained as a resource management priority throughout their rohe, and that the traditional and contemporary relationship between Te Ākitai Waiohūa and freshwater resources is maintained.

As stated in the CVA, Te Ākitai Waiohūa opposes reclamation or diversion of streams and wetlands. Where reclamation occurs Te Ākitai Waiohūa seeks significant enhancement of te taiao, including any impacts on the downstream flows to protect the health and wellbeing of the awa and associated habitats.

The original proposal sought to divert the upper reaches of Stream 2, maintaining catchment flows downstream. However, with the inclusion of stage 5, the upper reaches of Stream 2 would be reclaimed entirely. There is no additional wetland loss as a result of the fifth stage. Permanent loss of streams and wetlands (and overland flow paths) will have actual and potential ecological effects on:

- Loss or degradation of freshwater habitats;
- Diversion and alteration of freshwater habitats;
- Death and injury to freshwater fauna;
- Sedimentation; and
- Loss of freshwater volume and connectivity.

Overall, the applicant's ecological assessment identifies the level of adverse effects for stream and wetland reclamation as moderate to high because effects cannot be minimised and are permanent and irreversible. Significant residual adverse effects require offset mitigation or compensation.

Total stream loss from the Project is identified at 3,441 linear metres, compared to 2,643 linear metres under the original four-stage proposal. The total stream loss is a significant adverse effect, one that could be minimised by reducing the scale of the Project to four stages.

Offsite mitigation should occur as close as possible to the area of impact. Enhancement and restoration benefits from onsite streams, along with the offsite mitigation proposed at 86 Friedlander Road in Tuakau are acknowledged. However, the offsite mitigation alongside the Waikato River occurs within an entirely different catchment. Therefore, impacts on the catchment where the Project is located will not be sufficiently mitigated.

Amongst other things, Te Ākitai Waiohū seeks the inclusion of offset mitigation targets for the loss of streams and wetlands as a condition of consent. It is noted that draft conditions require Net Gain Delivery Plans for Riparian Planting and Wetland Planting, which are supported, but targets are sought to provide clarity of outcomes to be delivered.

4.1.4 Groundwater

Te Ākitai Waiohū understands that the Sutton pit is designed to be outside the mapped boundary of Kaarearea Pā and related lava flows, therefore avoiding drawdown effects on the shallow or perched groundwater system or lava flows.

The Project seeks approval for a maximum groundwater take of 19,426m³ per day and 7,090,517m³ per year, which reflects the maximum take for Stage 5 (40-50 years). Te Ākitai Waiohū is concerned about the impacts of the groundwater take on the baseflow of streams. The applicant proposes to augment several streams (NT-1, Maketu, Mangawheau and Hingaia Tributary) where monitored flows are identified below 200% of the site's mean annual low flow.

It is important to recognise the effect of groundwater take in combination with the loss of streams and wetlands, which are significant.

Draft Condition 134 provides for the maximum groundwater take and does not identify the ranges required by each stage. This approach is not supported by Te Ākitai Waiohū and water take quantities should relate to the groundwater inflow limits of each stage as per the groundwater assessment to ensure that the minimum amount of groundwater is taken at any one time to minimise adverse effects.

4.1.5 Rehabilitation

Te Ākitai Waiohū expects the Sutton Block to be rehabilitated once quarrying operations are complete. This step is crucial to remedying the overall effects of quarrying on te taiao and the broader cultural values of Te Ākitai Waiohū.

The application does not fully address expected and agreed outcomes for rehabilitation to remedy the significant impacts of quarrying on te taiao. It was understood that a Closure and Rehabilitation Management Plan (CRMP) would be submitted to Auckland Council for approval at least 12 months before extraction ends.

Draft condition 62(e) now requires Closure and rehabilitation plans to be included in the Quarry Management Plan within 5 years of confirmed closure, but no further details are provided in the conditions to clarify the outcomes to be achieved.

Te Ākitai Waiohū seeks further engagement around the principles and high-level outcomes for rehabilitation, and a condition of consent confirming that the CRMP will be developed in collaboration with and approval of Te Ākitai Waiohū to satisfy iwi kaitiaki obligations.

4.2 Draft Conditions

It is critical that the conditions incorporate opportunities for Te Ākitai Waiohū to exercise kaitiakitanga and mana motuhake within this significant area of its rohe. Te Ākitai Waiohū requires assurances that conditions are effective and enforceable over the duration of the Project to ensure that adverse impacts are sufficiently mitigated.

Initial comments are provided on the draft conditions in Attachment 1 as a starting point for further kōrero and participation in refining the final set of conditions. Greater certainty and clarity on the requirements of conditions, particularly those that will be implemented over the long term, will ensure expectations are understood and implemented by all parties.

Te Ākitai Waiohū seeks the opportunity to work through the conditions with the applicant to ensure the issues raised have been fully addressed.

5. Conclusion

Te Ākitai Waiohū have reviewed the fast-track application and opposes in principle the proposed activity of quarrying as it will have significant adverse impacts that cannot be avoided or fully mitigated. The primary concern is Stage 5 of the Project, as it does not appear to contribute significantly greater benefits but results in significantly more adverse impacts.

Ongoing commitment is sought from SAL to engage with Te Ākitai Waiohū to ensure that the Drury Quarry Expansion respects and reflects the cultural values and aspirations of Mana Whenua.

Ngā mihi,



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