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Dear Nick,

COMMENTS FROM INVITED PARTIES RESPONSE – HUNUA QUARRY DEVELOPMENT

Further to your recent instructions, we have reviewed the comments received from invited parties as set out in section 53(2) of the Fast-track Approvals Act 2026 and have responded to the transport matters raised.

1 INTRODUCTION

This response should be read in conjunction with the Commute Transportation Assessment Report (TAR) dated 26 March 2026. I note that the previous report sets out my qualifications and experience.

In preparing this letter, I confirm that I continue to comply with the Environment Court's Code of Conduct for Expert Witnesses.

I have reviewed and provided input into the applicant's (Winstone Aggregate') response to comments table in relation to comment codes (EPA Commenter Code) and the individual comment sub-code, and have referenced the codes in the responses below.

2 AUCKLAND TRANSPORT – COMMENTER CODE 8

2.1 ITEM 0.082 – SAFETY AND OPERATIONAL CONCERNS

Comment:

AT requested that the applicant provide a 1 m road shoulder widening as part of the proposed road widening works, along with a road safety assessment of the existing bend located on the eastern side of the vehicle access on Hunua Road. The assessment should demonstrate that adequate intervisibility/sightlines between approaching vehicles at the bend can be achieved to avoid potential conflicts associated with increased truck movements. This information is necessary to determine whether the adverse safety effects arising from increased truck trips can be appropriately mitigated.

Commute response:

1 m Road Shoulder

I agree with the AT comment regarding the 1 m shoulder and note that updated Draft Condition of Consent 73(c) dated 22 June 2026 includes a specific requirement that "Road widening works should include minimum 1 m road shoulder".

Safety Assessment

As per the TAR, I note Auckland Transport has highlighted concern with collisions on the same curve on Hunua Road some 1 km west of the site entrance. In this regard, although I do not consider there to be a trend in crashes in this area, additional rumble strips / audio-tactile (ATP) markings along the centreline of the corner could be included to discourage drivers from crossing the centreline and causing head-on collisions.

Significantly, I note that the crashes were not caused by trucks but rather by passenger vehicles approaching the corner, ignoring guidance signage, crossing the centreline and colliding with an oncoming vehicle, which happened to be a truck. I consider this to be an existing problem that is not the responsibility of the applicant. Hunua Road, to the west of the site entrance, is part of the Auckland Strategic Freight Network. The classification for Hunua Road is 1B, which is defined as follows:

“Roads of the highest strategic value to freight movement being Arterials where efficient freight movements must be actively supported to maintain Levels of Service, where competing modes and land uses require active management.”

I expect that maintenance and upgrades are undertaken by Auckland Transport to ensure that the existing freight and arterial network is adequate for its intended use, which includes large trucks and trailers.

The proposed audio-tactile (ATP) markings are appropriate mitigation in that they specifically address the cause of the crashes, being vehicles crossing the centreline on a corner. The ATP markings provide an audible / rumble warning to drivers if they cross the centreline.

AT has requested an assessment of intervisibility/sightlines between approaching vehicles at the bend. In this regard:

- This is a rather unusual request given the road exists and the request relates to through movements on the road (which already occur); and
- The road is also a strategic freight route and thus it would be expected that appropriate intervisibility would be provided along the route for all vehicles especially trucks.

I have, however, undertaken an additional assessment of the intervisibility/sightlines between approaching vehicles at the bend.

Austroroads Guide to Road Design Part 4A specifies Approach Sight Distance (ASD) recommendations. As per Section 3.2.1 ASD is given by:

$$ASD = \frac{R_T \times V}{3.6} + \frac{V^2}{254 \times (d + 0.01 \times a)}$$

where

ASD = approach sight distance (m)

R_T = reaction time (sec), refer to *AGRDR Part 3* (Austroroads 2016b) for guidance on values

V = operating (85th percentile) speed (km/h)

d = coefficient of deceleration, refer to Table 3.3 and *AGRDR Part 3* for values

a = a longitudinal grade in % (in direction of travel: positive for uphill grade, negative for downhill grade)

Based on a reaction time of 2 seconds, operating speed of 35 km/h, and $(d+0.01*a)$ of 0.36, the resulting recommended ASD is 33 m. I have assessed the operating speed based on existing advisory speed signage, which from observations is adhered to by trucks in the area.

An ASD assessment can be seen in Figure 1, an ASD in excess of 33 m is provided (approximately 35 m) which meets Austroad recommendations.

Figure 1: Stopping Sight Distance Assessment



Regardless of the above, I understand the applicant is prepared to offer the audio-tactile (ATP) markings as a show of good faith to improve safety in the area (specific to the crashes that have occurred) as per Draft Condition of Consent 73(i) dated 22nd June 2026. I consider this to be appropriate and recognise that AT support their implementation however do not consider them on their own to be “sufficient”. Refer to Section 2.2 for further discussion on this issue.

2.2 ITEM 0.083 – MITIGATION MEASURES

Comment:

AT therefore recommends that the applicant explore additional mitigation measures to improve sightlines at the bend. This may include options such as benching of the cut slope on the inside of the curve to increase visibility between drivers travelling in opposite directions, in addition to the proposed ATP treatment.

Accordingly, AT recommends that the applicant provide further mitigation measures to improve intervisibility between opposing vehicles at the bend. This should include an updated sightlines assessment and a Preliminary Design Road Safety Audit report. These are to be submitted to Auckland Council and Auckland Transport for review and approval prior to the commencement of the proposed increase in quarry activity and associated HCV movements.

Commute response:

I have further investigated the recorded crashes over the last 20 years (2006–2026) to gauge the historic picture of the crash record.

Four crashes involving trucks have occurred at the specified location during the 20-year period (2006–2026). The additional crashes included one non-injury collision and a single minor injury collision. Similar to the previous assessment, I consider that there is not an emerging trend of serious truck-

related crashes at that corner. The crashes over 20 years, one in 2013, one in 2021, one in 2023 and one in 2025, include:

- NZTA Crash ID: 2023273856 (Previously identified serious collision)
- NZTA Crash ID: 2025326299 (Previously identified serious collision)
- NZTA Crash ID: 2021184598
 - A single non-injury collision which involved a truck and trailer heading west on Hunua Road towards the quarry. The truck approached the corner too quickly and rolled over, crushing the W-section barrier on the left.
- NZTA Crash ID: 201326307
 - A single minor injury collision which involved a vehicle travelling east on Hunua Road failing to navigate the specified corner due to excessive speed, crossing the centreline and colliding with an oncoming truck heading west on Hunua Road.

It is further highlighted that an emerging trend related to truck crashes is not occurring on this specified corner. There were the same number of crashes involving trucks in the last 10 years as there were over the previous 10 years, being two crashes in each 10-year period.

Further, I note that the injury crashes were not caused by trucks but rather by passenger vehicles approaching the corner, ignoring guidance signage, crossing the centreline and colliding with an oncoming vehicle, which happened to be a truck.

As noted previously, while I do not consider two crashes over a ten-year period, or four over 20 years, to be a trend, additional Audio-Tactile Pavement (ATP) markings / rumble strips along the centreline of the corner could be included to discourage drivers from crossing the centreline and causing head-on collisions. In my opinion, while these are not specifically needed from an effects perspective relating to the increase in truck movements, I understand the applicant is prepared to offer them as a show of good faith to improve safety in the area as per Draft Condition of Consent 73(i) dated 22 June 2026.

I recognise that AT support their implementation however do not consider them on their own to be “sufficient”. In this regards, centreline-crossing and head-on crashes are generally categorised as opposing-direction or roadway-departure crashes and are commonly associated with driver fatigue, distraction, inattention, impairment, loss of control, or overtaking manoeuvres. The US Federal Highway Administration (FHWA) identifies centreline rumble strips as a proven countermeasure for this crash type, specifically noting that they are intended to alert distracted, drowsy, or otherwise inattentive drivers who unintentionally stray across the centreline. Injury crash reductions of between 38% and 50% on rural two-lane roads have been reported for head-on and opposing-direction sideswipe crashes where centreline rumble strips are installed¹.

Similarly, Queensland's Department of Transport and Main Roads identifies audio-tactile line markings as effective measures for reducing head-on collisions by alerting motorists through both sound and vibration as they cross the centreline therefore providing additional reaction time where a driver unintentionally drifts across the centreline².

As such the ATP markings will likely be very effective at reducing crashes on the corner.

AT have recommended benching of the corner to improve visibility. In this regard this benching:

¹ Federal Highway Administration (2011). Technical Advisory: Centre Line Rumble Strips

² Queensland Department of Transport and Main Roads. *Wide Centre Line Treatment and Audio Tactile Line Marking Fact Sheet*.

- Will not address the actual cause of the crashes (vehicle crossing the centreline);
- Is not the responsibility of the applicant as the trucks generated by the quarry have not caused the crashes;
- The corner is located on a section of Hunua Road classified as a freight route, level 1B. It is expected that maintenance and upgrades are undertaken by Auckland Transport to ensure that the existing freight network is adequate for its intended use, which includes large trucks and trailers; and
- Is likely to involve extensive works on the inside of the corner including works within the private property on the inside corner (See Figure 2 and Figure 3 below)

Figure 2: Google street view of corner (2026)



Figure 3: Auckland GIS view of corner



We have also investigated other potential mitigation measures and note:

- There is already extensive / appropriate signage installed on the corner approaches; and
- The road drops away on the outside of the curve meaning any works on the outside of the bend would be extensive.

Overall, although I do not consider four crashes over a 20-year period a trend, additional rumble strips along the centreline of the corner could be included to discourage drivers from crossing the centreline and causing head-on collisions. In my opinion, while these are not specifically needed from an effects perspective relating to the increase in truck movements, I understand the applicant is prepared to offer them as a show of good faith and they have been proven to be effective in reducing centreline-crossing crashes.

2.3 ITEM 0.084 – SAFE SYSTEM AUDIT

Comment:

The Traffic Report recommends the installation of a right-turning bay within the public road carriageway at the vehicle entrance. This includes upgrading the existing carriageway, modifying the existing vehicle crossing, removing the existing stone wall near the vehicle crossing, and relocating the existing gate further within the property boundary.

AT supports the proposed road widening works, including the modification of the vehicle crossing. A Safe System Audit report should be provided at the future Engineering Approval (EA) stage.

Detailed design aspects of the proposed modifications to the public road carriageway will be reviewed as part of the future EA application process.

Commute response:

Noted and agree. A Safe System Audit Report has been conditioned as per Draft Condition of Consent 73(ii) dated 22 June 2026.

2.4 ITEM 0.085 – HUNUA ROAD SIGHTLINE ASSESSMENT

Comment:

AT issued a Section 67 memo to Council on 29 April 2026. AT is not satisfied with the applicant's response regarding the sightlines assessment at the existing bend on Hunua Road, where two serious crashes were recorded in 2023 and 2025.

Commute response:

See response to Item 0.083 (Section 1.2).

Although I do not consider two crashes over a ten-year period, or four over 20 years, to be a trend, additional Audio-Tactile Pavement (ATP) markings / rumble strips along the centreline of the corner could be included to discourage drivers from crossing the centreline and causing head-on collisions. In my opinion, while these are not specifically needed from an effects perspective relating to the increase in truck movements, I understand the applicant is prepared to offer them as a show of good faith to improve safety in the area as per Draft Condition of Consent 73(i) dated 22 June 2026.

2.5 ITEM 0.086 – ATP CONSENT CONDITION

Request:

Recommends the inclusion of an additional consent condition for Road Safety Mitigation – ATP Centreline Markings.

Auckland Transport (AT) has reviewed the proposed draft conditions provided by the applicant (dated 9 June 2026) and recommends the inclusion of the following additional conditions:

1. Road Safety Mitigation – ATP Centreline Markings

The Consent Holder must install audio tactile profiled (ATP) centreline markings (“rumble strips”) on Hunua Road, on the western approach to the subject site access.

The ATP markings must be located along the centreline of the horizontal curve in the vicinity of the recorded serious injury crashes (CAS Crash IDs 2025326299 and 2023273856), or as otherwise agreed in writing by the Road Controlling Authority.

The ATP markings must be installed within 3 months of this consent being given effect to, and prior to any material increase in heavy vehicle movements associated with the exercise of this consent, unless otherwise agreed in writing by the Road Controlling Authority.

The purpose of this measure is to improve lane discipline and reduce the risk of opposing vehicles encroaching across the centreline, thereby mitigating the likelihood of head-on and side-swipe crashes.

All works must be undertaken in accordance with the standards and requirements of the Road Controlling Authority.

Commute response:

Noted. Draft Condition of Consent 73(i) dated 22 June 2026.

2.6 ITEM 0.087 – SIGHT DISTANCE CONSENT CONDITION

Request:

Recommends the inclusion of an additional consent condition for Road Safety Mitigation – Sight Distance Improvements.

Auckland Transport (AT) has reviewed the proposed draft conditions provided by the applicant (dated 9 June 2026) and recommends the inclusion of the following additional conditions:

1. Road Safety Mitigation – Sight Distance Improvements

The Consent Holder must implement additional road safety mitigation measures on Hunua Road at the horizontal curve located on the western approach to the subject site access, in the vicinity of the recorded serious injury crashes (CAS Crash IDs 2025326299 and 2023273856).

The mitigation measures must include, but are not limited to, benching or regrading of the cut slope on the inside of the curve to improve forward visibility and sight distance between opposing drivers. These works must be undertaken in addition to the installation of audio tactile profiled (ATP) centreline markings required by this consent.

The detailed design and extent of the mitigation measures must be provided to, and approved in writing by, the Road Controlling Authority prior to implementation.

The mitigation measures must be implemented within 3 months of this consent being given effect to, and prior to any material increase in heavy vehicle movements associated with the exercise of this consent, unless otherwise agreed in writing by the Road Controlling Authority.

The purpose of these works is to improve intervisibility between vehicles travelling in opposite directions and to reduce the risk of head-on and side-swipe crashes.

All works must be undertaken in accordance with the standards and requirements of the Road Controlling Authority.

Commute response:

As I have outlined above, I do not agree with this condition regarding sight line improvements / benching of the corner. See response to Item 0.082 (Section 2) previously for details.

3 AUCKLAND COUNCIL COMMENTER CODE 8

3.1 FRANKLIN LOCAL BOARD

3.1.1 ITEM 0.199 – TRUCK VOLUMES

Comment:

The commenter notes the considerable increase in truck movements and has significant concerns about Hunua Road, which is narrow and windy with sight line issues between Papakura and the entrance to the quarry. Commenter notes that the community reports trucks regularly cross the centre line and are a safety risk to other road users and asks for road widening and realignment to be considered.

Commute response:

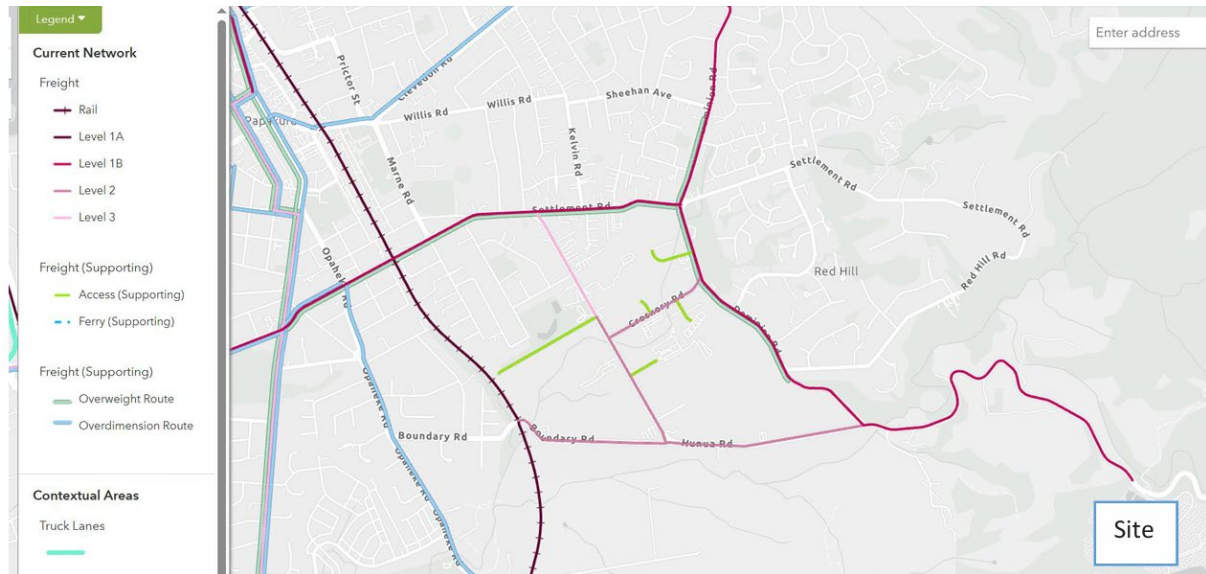
It is noted that although the proposal is anticipated to increase truck volumes by 111%, this is at full capacity and this will not occur straight away but instead there will be a gradual increase in truck volumes.

Hunua Road, (to the west of the site entrance) is part of the Auckland Strategic Freight Network. The classification for Hunua Road is 1B which is defined as follows:

“Roads of the highest strategic value to freight movement being Arterials where efficient freight movements must be actively supported to maintain Levels of Service, where competing modes and land uses require active management.”

This is shown in Figure 4 below.

Figure 4: Auckland Transport Freight Routes



It is expected that maintenance and upgrades are undertaken by Auckland Transport to ensure that the existing freight and arterial network is adequate for its intended use, which includes large trucks and trailers.

Additionally, refer to Section 2.1.

3.2 TRAFFIC ENGINEERING

3.2.1 ITEM 0.465 – INTERNAL HAUL ROAD GEOMETRY

Comment:

Commenter notes they advised that additional information should be provided to enable an appropriate assessment of the internal haul road geometry. In particular plans to identify the width of the temporary haul roads servicing each extraction stage and demonstrate how bends will be designed and treated to ensure the safe operation of truck and trailer units.

Commute response:

Refer to the below from Auckland Council's traffic engineering memo Section 5.0:

"I also recommended that consideration be given to including a consent condition requiring the internal haul roads to be designed so that truck movements can be undertaken without reversing manoeuvres to access quarry material. In my opinion, minimising reversing movements represents good engineering practice and would assist in promoting the safe and efficient operation of the internal transport network.

The project lead and processing planner concluded that such a requirement was not within the scope of the resource consent, and this matter was subsequently considered by the Council processing planner lead. The project processing planner concluded that the design and operation of the internal haul roads fall outside the scope of matters that can reasonably be addressed through this consent, noting that the haul roads will be used solely by quarry operators and staff, with no public access. It was considered that the safe and efficient management of the internal haul road network is an operational matter that is appropriately managed by the quarry operator.

I acknowledge this conclusion and have not pursued the recommended condition further."

As such, I understand this issue is outside the scope of Auckland Council and has not been pursued further in conditions by Auckland Council. Regardless, Hunua Quarry has been operating for many years with the haul road constantly changing and accommodating trucks and trailers. Adequate space is provided on site to ensure no queuing onto Hunua Road will occur, which I consider to be appropriate.

3.2.2 ITEM 0.242 – PROTECTION OF PUBLIC ASSETS CONDITION OF CONSENT

Comment

Commenter recommends an additional condition: "Protection of Public Assets - Unless specifically authorised by this consent, the consent holder shall ensure that no damage occurs to public roads, footpaths, berms, kerbs, drains, reserves, or other public assets as a result of earthworks or construction activities. Should any such damage occur, Auckland Council shall be notified within 24 hours of its discovery. The consent holder shall be responsible for all costs associated with reinstating the affected asset."

Commute response:

Noted and agree. This is included as Draft Condition of Consent 77 dated 22 June 2026.

3.2.3 ITEM 0.244 – RIGHT TURN BAY

Comment:

Commenter agrees with Auckland Transport's assessment of the wider transport network and acknowledge the transport mitigation measures proposed by the applicant, including the right-turn bay at the quarry access and associated road safety improvements on Hunua Road.

Commute response:

Noted.

3.3 STRATEGIC & PLANNING MEMO

3.3.1 ITEM 0.317 – ROADING SAFETY

Comment:

Auckland Transport (Annexure 4) are generally in agreement with the Applicant with respect to effects on the roading network. However, they have an outstanding concern with respect to roading safety at the corner on Hunua Road identified in red in Figure 1 below:

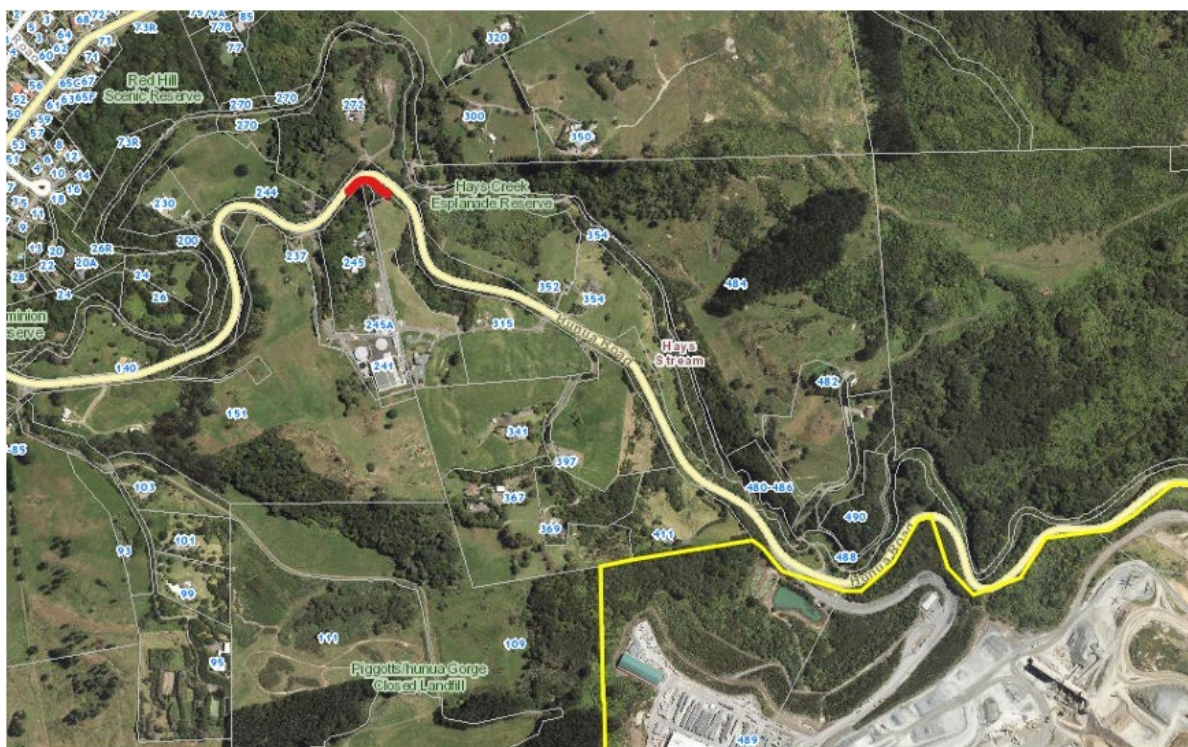


Figure 1: Aerial image showing subject site (outlined in yellow) and area of concern raised by Auckland Transport (red).

Commute response:

Noted – Refer to Section 2.1.

3.3.2 ITEM 0.318 – CRASH HISTORY

Comment:

Auckland Transport are of the opinion that the crash history indicates an inherent safety trend and concern that will be exacerbated by the increased trip generation arising from the proposed development. It is understood that there are two serious injury crashes of concern (in 2023 and 2025) caused by a vehicle crossing the centre line at this bend.

They have recommended that a road safety assessment of the existing bend located on the eastern side of the vehicle access on Hunua Road be provided, including an intervisibility assessment, to determine whether the adverse safety effects from increased trip movements are/can be appropriately mitigated. In lieu of this, a condition has been recommended that the applicant provide a 1m road shoulder in this location.

Commute response:

Refer to Section 2.1.

3.3.3 ITEM 0.319 – LEGAL AND PLANNING RESPONSE

Comment:

We acknowledge the applicant's position in this regard and generally concur with respect to the nature of the crashes and the implications of the Strategic Freight Network. It was discussed through consultation processes to date that the Applicant would provide a further planning and legal response to this matter to expand upon this question of scope. At the time of writing, this response has not been provided. We are therefore unable to reach a conclusion with respect to whether the increase in truck

movements to/from the 14 site – being an increase of 111% – will be directly attributable to an exacerbation of the safety risks on this network in such a manner that warrants mitigation (i.e.: whether the effects are within scope).

Commute response:

Noted. See planning and legal response.

3.3.4 ITEM 0.320 – PROPOSED CONDITIONS

Comment:

*Delivering Auckland Transports' recommended condition would likely pose an implementation issue for the Applicant. It would require additional consents (removal of street trees at a minimum), and some significant retaining works within the road reserve. There is also limited space available within the road reserve for these works to be undertaken, noting the private property boundaries are in relatively close proximity to the existing edge of the formed road corridor. From a planning perspective, it therefore would **not** be appropriate to include the condition recommended by Auckland Transport to mitigate these effects given they trigger additional consent requirements, may not be practical to deliver, and could have significant impacts for/on adjoining private properties.*

Commute response:

I agree with this Auckland Council conclusion regarding the existing corner. As I have noted in Section 2.2 above, the suggested mitigation of benching the corner is not warranted by the proposal in my opinion and is likely to involve extensive works on the inside of the corner, including works within the private property on the inside corner.

3.3.5 ITEM 0.321 – PANEL CONSIDERATION

Comment:

We recommend the Panel first consider whether this is an effect that can be directly correlated to this application (i.e. is within scope). In the event they consider there is a safety effect in this regard from this proposal, then we recommend that a s67 request for a more comprehensive road safety and intervisibility assessment would be the appropriate mechanism to address this.

Commute response:

Noted.

3.3.6 ITEM 0.322 – PANEL CONSIDERATION

Comment:

For completeness, we note that the significance of the effect here is potentially high as it includes the potential for increased risk to human life. Additionally, transport safety along Hunua Road is understood to be a key concern for local residents, Councillors and the Local Board (Annexure 17). As such we would encourage careful and thorough consideration of this matter by the Panel.

Commute response:

As I have noted above, the presence of four crashes in 20 years does not, in my opinion, constitute a significant safety concern. Further mitigation in the form of ATP markings has been offered by the applicant. This mitigation, in my opinion, directly addresses the crashes involving trucks, being cars crossing the centreline. No other mitigation is considered to be required.

NEIGHBOUR COMMENTS COMMENTER CODE 12

3.4 ITEM 0.013 LOT21 DP 132757 – 243 KAURI VIEW ROAD

Comment:

This application projects an 111% increase in traffic volumes on Hunua, Settlement and Beach Roads, but concludes that these roads have been constructed and maintained adequately to carry this capacity. Missing from these assessments is the impact on the alternative “rat-run” routes used by ...[quarry]...trucks, Boundary, Opaheke, Sutton and Great South roads. These roads are all at capacity at peak times with significant congestion and associated safety issues.

Projects proposed by NZTA and Auckland Transport for capacity and functional improvement, Mill Road and Papakura-Drury Arterial, are constantly deferred exacerbating transport issues. To say in this AEE that the current transport routes are adequate to take this increase in truck volume is grossly misleading.

Commute response:

I recognise that quarry trucks are physically able to take routes other than those directly to SH1 using the freight routes shown in Figure 4 above and included in the TAR. This could be for varying reasons, including destinations for material along these routes.

The main routes assessed in the TAR are, however, considered to be the routes the majority of quarry trucks will take. This is evident in the AM peak surveys of the Hunua Road / Boundary Road intersection, where the truck drivers' decision is essentially made to potentially take the “rat-run” described above. In the entire 2-hour morning period, of all the trucks travelling from the east on Hunua Road, i.e. from the direction of the existing quarry, the survey results show 91% stay on Hunua Road and travel north rather than turn left into Boundary Road.

I also note that Boundary Road, part of Opaheke Road and Great South Road are all arterial roads and thus are expected to carry significant volumes of trucks. While Sutton Road, the other road mentioned above, is not an arterial, it already caters for industrial activity in the north Drury area and thus already caters for trucks. Auckland Transport's recent counts show the heavy vehicle percentage between 9% and 19%.

Yours sincerely

Commute Transportation Consultants



Leo Hills

Director

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