

Attn Maggiw Burns

Application Lead , Fast Track Team

Thank you for the opportunity to comment on the Hunua Quarry Fast-track Application. My partner Jan and I have lived at [REDACTED] for approximately 20 years. During this time we have enjoyed the rural character of the area which we appreciate has included the existing quarry operation as limited by existing resource consent conditions. Intervening exotic and native vegetation between our dwelling and the existing quarry means that our indoor and outdoor living areas are not visually exposed to the quarry.

Our specific concerns relate to:

- a) Potential rural character issues relating to the proposed extended quarrying hours.
- b) Potential visual amenity effects.

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Rural Character and Operating Hours

We understand that existing operations are required to cease at 1.00pm on a Saturday. To maintain our existing level of rural amenity we request that **Condition 81** in relation to **Construction Noise** is amended to read as follows:

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Construction works must only take place on site between the hours of 7.30am to 6:00pm, Monday to Friday Saturday and 7.30am to 1.00pm on Saturday. This condition does not prevent quiet Construction work from taking place outside standard construction hours providing the noise emissions are inaudible at the notional boundary of any occupied dwelling.

We also request consequential changes to the conditions to reflect this revised timing of operation.

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Visual Amenity Effects

Appendix 3 to the Landscape Effects Assessment prepared by Boffa Miskell identifies **moderate-high** adverse visual effects in relation to our property. We understand that this corresponds to a 'more than minor' effect and falls just short of a 'significant' adverse effect on the effects rating scale used in the Boffa Miskell assessment.

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An off-site Visual Mitigation Planting Condition is proposed for properties identified as experiencing **moderate-high** adverse visual effects, such as our property. We note that the assessors have not visited our property and hence their assessment of visual amenity effects on our property can only be an estimate 'at best' as our dwelling is not visible from Ponga Road.

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Given the scale of the potential effect (ie effectively one notch away from 'significant'), along with the fact that the assessors have not visited our property nor been able to see it from a publicly accessible location, we request that:

- a) The applicant prepare (and provide to us) two digital terrain model view of the development from our property clearly showing the various development stages and testing the location of potential mitigation planting. The first model view should rely on landform LiDAR data only. The second model view should rely on landform and vegetation LiDAR data.
- b) The applicant's assessors visit our property to discuss potential off site vegetation mitigation measures as soon as possible and before the consent is granted, so that we can understand the realistic influence of potential mitigation measures and potential timing of such plantings relative to the various stages of the proposal.

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0.008

Joe Shannon & Jan Dupker

[REDACTED]

[REDACTED]

Email : [REDACTED]

[REDACTED]

31st July 2026

Hon Shane Jones

Minister for Oceans and Fisheries
Minister for Regional Development
Minister for Resources
Associate Minister of Finance
Associate Minister for Energy



31 July 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act 2024 substantive application – Hunua Quarry Development [FTAA-2603-1185]

Dear Chris,

Thank you for the opportunity to comment on the Hunua Quarry Development substantive application [FTAA-2603-1185] under the Fast-track Approvals Act 2024 (FTAA).

The FTAA has been established to provide a regime that makes it easier and quicker for regionally and nationally significant projects to gain the approvals needed for development, in support of this Government's economic growth objectives.

I have considered the application and its alignment with the priorities of my Resources portfolio. My comments are attached as Annex One.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'S. Jones'.

Hon Shane Jones
Minister for Resources

Annex One – Resources comments

Project overview

1. The applicant, Winstone Aggregates (Winstone) has applied for Fast-track approval for its proposed Hunua Quarry Development project (the project). The project entails the staged increase in aggregate resource at the existing Hunua Quarry in the Auckland Region, just southeast of Papakura.
2. Winstone state that the project would unlock access to more than 225 million tonnes (MT) of greywacke aggregate. The Hunua Quarry averaged 2.72 million tonnes of annual production from 2016-2025. The project would provide for current, or modestly increased rates of production to continue over an 80-year period. Alternatively, Winstone's Economic Impact Assessment notes that the project could support increased production peaking at 5.4 MT annually, over a shorter period, if there is sufficient demand in the Auckland Region.

Resources comments

3. The Government's Minerals Strategy, published in January 2025 sets a long-term, strategic approach to how we develop our mineral resources. The Minerals Strategy emphasises the production of aggregate, including greywacke aggregate, such as that from the Hunua Quarry, as strategically important and the building blocks for our infrastructure and housing needs. 0.001
4. Access to long-term sources of aggregate in the Auckland Region may provide certainty for infrastructure planners and support New Zealand's significant infrastructure pipeline. This pipeline is central to the Government's Going for Growth and Going for Housing Growth strategies. Amongst other uses, Greywacke aggregate is used in production of concrete and in road construction. The Aggregate and Quarry Association estimate that on average, each new house requires approximately 250 tonnes of aggregate, and that construction of one km of a two-lane highway requires approximately 14,000 tonnes of construction aggregate. The applicant estimates the structural deficit of aggregate supply in the Auckland region at 2.1 MT in 2026, growing to 6.2 MT per annum in 2055. 0.002
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0.004
5. New Zealand's Critical Mineral List recognises aggregate as critical. This is due to the high level of economic importance of aggregate to New Zealand, and the regulatory constraints limiting new supply opportunities. It is important that quarries be located near demand centres, such as Auckland, our largest demand centre; a common industry short-hand estimate is that the cost of aggregate doubles after the first 30km it is transported. 0.005
0.006
6. Winstone estimated the present value of avoided transport, emissions and social costs (arising from road injuries and fatalities) of sourcing aggregate from Hunua Quarry compared to an alternative quarry in Waikato, over the 80-year extension. Winstone estimated the present value of avoided costs at \$663 million at a 5 per cent discount rate, in the most conservative scenario modelled. 0.007



3 August 2026

Environmental Protection Agency
Private Bag 63002
Wellington 6140

Email: substantive@fasttrack.govt.nz

Tēnā koe,

Re: Hunua Quarry Development Fast-Track Application FTAA-2603-1185 – Te Ākitai Waiohū comments

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

1. Te Ākitai Waiohū Structure

Te Ākitai Waiohū is a Mana Whenua iwi of Tāmaki Makaurau/Auckland.

Te Ākitai Waiohū is also a member of Ngā Mana Whenua o Tāmaki Makaurau, the tribal collective and beneficiary of the Treaty of Waitangi settlement redress received in the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Deed and related Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014. Te Ākitai Waiohū is specifically a member of the Waiohū Tamaki Alliance rūpū.

Te Ākitai Waiohū completed negotiations with the Office for Māori Crown Relations (Te Arawhiti) to settle the specific historical claims of Te Ākitai Waiohū under Te Tiriti o Waitangi. Te Ākitai Waiohū signed a Deed of Settlement with the Crown in 2021 and is waiting for supporting legislation to be introduced and passed by Parliament.

Te Ākitai Waiohū Settlement Trust (TAWST) is an active Post Settlement Governance Entity that represents the people of Te Ākitai Waiohū and is responsible for administering any redress received in the Te Ākitai Waiohū settlement. Te Ākitai Waiohū also actively participates in local government, planning and consenting processes through the Resource Management Act 1991 (RMA) and its associated mechanisms.

Although other entities including Te Ākitai Waiohū Waka Taua Incorporated Society and Te Ākitai Waiohū Taiao Manatōpū engage in the RMA process at a kaitiaki level, as an iwi authority, the Settlement Trust has an interest in fast-track projects.

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



2. Cultural Values Assessment

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

- I. High-level CVA setting Te Ākitai Waiohū relationships and associations with the area.
- II. Addendum CVA responding to the fast-track draft proposal for an eight-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.

In Papakura, Te Ākitai Waiohū built and maintained other kāinga (settlements) and cultivations. The eastern section of Papakura closer to Te Hunua is known as Kirikiri which incorporates Pukekōiwiriki (Red Hill) a defensive hilltop pā site occupied by Waiohū and their Waiohū ancestors. This connection continued through to the time of Te Ākitai Waiohū led by paramount chiefs' Ihaka Takaanini and his father Pepene Te Tihi.

The location of Pukekōiwiriki looking out to the Manukau harbour in the west and Te Hunua in the east made it a strategically important landmark. The soils surrounding the maunga also offered opportunities to grow māra kai (food gardens) supported by nearby waterways at Hays Creek and Kirikiri Stream. Proximity to the Manukau Harbour for food and transport and Te Hunua for refuge and forest materials also made the maunga ideal for settlement.

Te Ākitai Waiohū has never collectively owned or occupied land as an iwi in East Wairoa, Pokeno, Pukekohe, Tuakau or Tuhimata since this time, which has restricted the iwi geographically to Pūkaki and Māngere, where tribal members did actually recover a fraction of confiscated land during Compensation Court hearings.

In recognition of the loss of land important to Te Ākitai Waiohū in the region, the iwi received several statutory acknowledgements as Treaty of Waitangi settlement redress. They include:

- Kirikiri (Children's Forest Settlement Road) Reserve and Red Hill Scenic Reserve in Papakura.
- Drury Creek Islands Recreation Reserve and Drury Conservation Area in Drury.
- Te Maketu Historic Reserve, Raventhorpe Conservation Area and Raventhorpe Scenic Reserve in Ramarama.
- Paparimu Conservation Area, Mangatāwhiri Forest Conservation Area.
- Richard Sylvan Memorial Scenic Reserve and Vining Scenic Reserve in Te Hunua.



Te Ākitai Waiohū is also a Mana Whenua member on the Pukekōwhiri Pā Joint Management Committee. This co-management arrangement has been put in place to help restore and protect this historic and culturally significant site.

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 ongoing engagement by Winstone Aggregates has occurred with our Kaitiaki team on the Project since 2024, when consultation started on the proposal, initially as a resource consent application. Engagement at a governance level on this Project has yet to occur.

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Te Ākitai Waiohū agree the intention to progress a fast-track application was introduced at the Kaitiaki forum in 2025, of which Te Ākitai Waiohū regularly attends. The record of engagement and summary of key concerns are a generally accurate reflection of previous feedback provided by the iwi.

Te Ākitai Waiohū acknowledges and appreciates the resourcing of a planning consultant to assist with the review of selected parts of 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. Te Ākitai Waiohū did record in feedback and in the CVA addendum that the full application was not made available prior to lodgement. It should be noted that Te Ākitai Waiohū is invited to make comments through TAWST as an iwi authority on multiple applications under the FTAA, affecting the iwi's limited capacity.

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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 filed updated information on the Project on 22 June 2026, and this information supersedes earlier versions of the documents.

The joint memorandum filed by Auckland Council and Winstone Aggregates includes Schedule 1 — Issues list. This records the further work undertaken in response to the lack of assessment of the Project on Pukekōwhiri pā in Red Hill as part of a site of cultural significance and Red Hill scenic reserve as a public park and part of the cultural redress



statutory acknowledgement site in the Te Ākitai Waiohū Treaty Settlement Package. Te Ākitai Waiohū appreciates this additional assessment being undertaken.

As stated in our CVA addendum, Te Ākitai Waiohū opposes in principle the proposed quarrying activity as it will have significant adverse cultural effects that cannot be avoided or fully mitigated. This includes the removal of indigenous vegetation in Significant Ecological Areas (SEA) and Outstanding Natural Landscapes (ONL) areas and reclamation, diversion and modification of a local stream and wetlands. This position remains unchanged.

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4.3 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. Stages of the work include extensive realignment Mangapū Stream and removal of wetlands.

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There are no Statutory Acknowledgement Areas within the Project site area because it is privately owned land, however, as noted earlier, there are several Statutory Acknowledgement Areas and statements of association from the Te Ākitai Waiohū Treaty settlement in the vicinity of the site.

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Mangapū and the nearby Kirikiri Awa were part of a complex network of settlements throughout the Hunua Ranges, connected by local waterways and valleys. Together, they contributed to a Te Ākitai Waiohū cultural landscape, demonstrating the historic occupation and use of the Project site and its surrounding area for hundreds of years. The awa supported native plants, birds, and fish while also providing important resources such as raupō and harakeke for building and weaving, as well as treasured rongoā used for traditional healing.

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Pukekōiwiriki pā is inextricably linked to the Land Wars of 1863 through a series of events that strengthened its enduring relationship with the Kīngitanga movement and helped shape the Te Ākitai Waiohū iwi that exists today. As such, the history of Pukekōiwiriki preserves stories and experiences that continue to guide the people of Te Ākitai Waiohū into the future.

Like many pā in Tāmaki Makaurau, Pukekōiwiriki has been heavily modified over time, leaving only remnants of the former hilltop settlement, including traces of its traditional defensive ditches. Recent initiatives to protect, celebrate, and enhance the pā – including the construction of a waharoa and the provision of low-impact access – have enabled the public to visit this culturally significant place in a respectful manner.

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Te Ākitai Waiohū has reviewed the further assessment it requested regarding the landscape character and visual effects of the Project as viewed from Pukekōiwiriki pā and Red Hill Scenic Reserve. This assessment concludes that:

- There will be a low to moderate visual effect on views from the pā during quarry operations, reducing to a low effect over time as planting becomes established.
- There will be a very low visual effect on views from Red Hill Scenic Reserve, both during quarry operations and following the completion of quarrying.

Te Ākitai Waiohū remains concerned that the overburden area is very large and will occupy a considerable portion of the central view. The proposed mitigation planting will take many

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years to become established (30+ years). Of additional concern is that Stage 7 will result in a noticeable lowering of the ridgeline, which has historically served as an important navigational marker.

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Te Ākitai Waiohū reiterates its interest in acquiring taonga, including rākau over 100 years old, for cultural purposes. There should also be opportunities for Te Ākitai Waiohū to fulfil its role as Kaitiaki through activities such as planting, and salvage and relocation of native species.

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Te Ākitai Waiohū supports conditions that seek to recognise and protect cultural values. Te Ākitai Waiohū has reviewed the proposed conditions (currently Conditions 13–18) relating to the Kaitiaki Forum and supports these conditions. It is however, expected that the Kaitiaki Forum will need to meet with greater frequency than existing arrangements, particularly during the review of management plans.

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4.4 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 to cover 10 years of work to prevent any delays during the works in the event that subsurface archaeological remains are exposed.

Given the historical occupation of this area and the fact that the works involve extensive modification of waterways, Te Ākitai Waiohū does not support reliance on the NZHPT authority process. Recording information on archaeological discoveries does not mitigate the adverse effects on cultural values arising from the destruction of archaeological sites.

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Te Ākitai Waiohū does not support reliance on the accidental discovery provisions in Auckland Unitary Plan Rule E12.6.1 (currently reflected in Condition 96). Specific Accidental Discovery Protocols should be developed in consultation with Mana Whenua and incorporated into the consent conditions. Given the current legislative reforms and the duration of the consents, it is likely that new plan provisions will come into effect, with different rules and references. It will also be necessary for an agreed protocol to address tikanga Māori specific to the site.

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Notwithstanding, conditions 2, 7, 9 and 10 relating to the HNZPT process that specifically recognises Te Ākitai Waiohū are supported. Te Ākitai Waiohū is however, concerned that a 12 months' timeframe for filing of archaeological records is excessively long (condition 13). This should be reduced to no more than 6 months.

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Te Ākitai Waiohū seeks that:

- Archaeological Management Plans be prepared in stages and provided to Te Ākitai Waiohū for review and feedback prior to approval.
- Discovery protocols be developed in consultation with Te Ākitai Waiohū to ensure that tikanga Māori processes are followed and that appropriate assessments are undertaken before any decision is made regarding the destruction of a discovered site.
- Te Ākitai Waiohū be provided with opportunities to deliver cultural inductions prior to the commencement of earthworks and to undertake iwi monitoring during earthworks.

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4.5 Ecology and biodiversity

The biodiversity within the unmodified parts of 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.

Vegetation in this area historically comprised kauri–taraire–kohekohe–tawa forest in the northwest, rimu–tawa–kamahi forest on elevated ridges, and kahikatea–pukatea–tawa forest in inland valleys. The quarry development to the south (Stages 1, 3 and 4) affects vegetation with a regional threat status of "Endangered".

The quarry development to the west (Stage 7) includes kauri, tanekaha, rimu, and kahikatea, as well as a diverse assemblage of indigenous broadleaved shrubs and trees, including kākūka, hangehange, māhoe, and porokaiwhiri. This ecosystem type also has a regional threat status of "Endangered".

The proposal includes removal of 38.2ha of indigenous vegetation, including within an SEA and 6ha of works within the ONL.

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 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. This is specified in what is currently condition 188 (Table 2 - Offset and compensation measures proposed for identified residual effects).

The amount of indigenous vegetation and habitat, especially within 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 off-set mitigation occurs on the site or within the immediate environs of the area of impact.

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Te Ākitai Waiohū supports off-site planting commencing with the granting of the resource consent so that benefits of the mitigation can be derived as soon as possible.

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Te Ākitai Waiohū are not opposed to the indigenous forest revegetation at Meremere Quarry, as specified Table 2 - Offset and compensation measures proposed for identified residual effects. However, no more than 10% of the required off-set mitigation should be at Meremere Quarry, which is outside the traditional Te Ākitai Waiohū area of interest. Te Ākitai Waiohū requires that the majority of the mitigation is within the iwi area of interest so that its responsibilities as kaitiaki can be exercised appropriately.

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4.4 Streams and wetlands

Te Ākitai Waiohū 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 Waiohū and freshwater resources is maintained.



As stated in the CVA, Te Ākitai Waiohū opposes reclamation or diversion of streams and wetlands. Where reclamation occurs Te Ākitai Waiohū 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.

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The proposal includes the loss of 1,200m of Mangapū Stream tributary. The applicant's ecological assessment identifies the level of adverse effects for stream and wetland reclamation as a significant adverse ecological effect. These are permanent and irreversible. Significant residual adverse effects require offset mitigation or compensation.

Te Ākitai Waiohū supports the conditions relating to Stream Realignment Management Plan and stringent reporting. Te Ākitai Waiohū is concerned with the potential sedimentation effects on the downstream freshwater receiving environments caused by the stream realignment and bulk earthworks associated with removal of overburden in the initial stage of works. The annual reporting requirement should be amended to six monthly.

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Te Ākitai Waiohū expects to be involved in all stages of the stream alignment and restoration.

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4.5 Rehabilitation

Te Ākitai Waiohū supports the Landscape Rehabilitation Strategy and Management Plan (currently conditions 53 – 54).

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Te Ākitai Waiohū expects to be invited to participate in the development of the Landscape Rehabilitation Strategy and Management Plan. The expectation is that this plan set a clear requirement for restoration, particularly in SEA, the ONL, the ridgeline and those parts of the quarry operation most visible from Pukekōiwhiri pā occur at the completion of each stage.

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This is crucial to remedying the overall effects of quarrying on te taiao and the broader cultural values of Te Ākitai Waiohū.

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

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4.6 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. While Te Ākitai Waiohū supports the conditions requiring a Kaitiaki Forum, Te Ākitai Waiohū will continue to assert its own position on matters.

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Draft conditions 13 – 18 are a starting point for further korero. Te Ākitai Waiohū expects to be invited to participate in refining the final set of conditions, particularly those that will be implemented over the long term, to ensure expectations are understood and implemented by all parties.

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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. Where mitigation is proposed, it will take many years to replace what is removed, damaged or lost. Te Ākitai Waiohū remain particularly concerned with:

- The diversion of the Mangapū Stream tributary.
- The amount of off-set mitigation that is outside the traditional Te Ākitai Waiohū area of interest, impacting on its ability to exercise its responsibilities as kaitiaki.
- The removal of vegetation and ridgelines that are directly in the sightline of Pukekōiwiriki pā.

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

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Ngā mihi,

Te Ākitai Waiohū Settlement Trust

PO Box 59 185

Mangere Bridge

Auckland 2151

Email: tawst@teakitai.com

Your Comment on the Hunua Quarry Development project

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fasttrack.govt.nz.

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)	Te Ākitai Waiohū Settlement Trust		
First name	Nigel		
Last name	Denny		
Postal address	PO Box 59 185, Mangere Bridge, Auckland 2151		
Home phone / Mobile phone		Work phone	
Email (a valid email address enables us to communicate efficiently with you)	tawst@teakitai.com		

2. We will email you draft conditions of consent for your comment			
☒	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

Comments are provided in the attachment.

Minister of Climate Change
Minister for Energy
Minister of Local Government
Minister of Revenue



David Allen
Fast-track Expert Panel Chair
substantive@fasttrack.govt.nz

Dear David,

Thank you for the invitation to comment on Winstone Aggregates' Fast-track Approvals Act 2024 (FTAA) substantive application for the Hunua Quarry Development (FTAA-2603-1185).

I broadly support projects that deliver significant regional or national benefits, including the Hunua Quarry Development. The proposal would help secure a long-term, proximate aggregate supply for Auckland's housing, transport and infrastructure markets, reducing reliance on more distant sources and supporting supply-chain efficiency.

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The application also identifies operational benefits from the proposed western haul road, including reduced haulage time, improved truck productivity and fuel savings. These benefits are primarily economic and infrastructure-related but may also reduce transport-related emissions compared with alternative supply scenarios.

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Yours sincerely

Hon Simon Watts
Minister of Climate Change

Hon Chris Bishop

Attorney-General
Minister of Housing
Minister for Infrastructure
Minister Responsible for RMA Reform
Minister of Transport
Associate Minister of Finance



05 AUG 2025

FTAA-2603-1185

David Allen
Fast-track Expert Panel Chair
substantive@fasttrack.govt.nz

Dear David,

Thank you for the invitation to comment on Fletcher Concrete and Infrastructure Limited's Fast-track Approvals Act 2024 (FTAA) substantive application, the Hunua Quarry Development project (FTAA-2603-1185). I am responding in my capacity as Minister for Infrastructure.

Infrastructure is important for growth and prosperity. Our view is our planning system has not been enabling of growth, hence the establishment of the FTAA.

I wish to take this opportunity to express my broad support for projects which deliver positive outcomes for New Zealand, including the Hunua Quarry Development project. Please take this letter of support as a reflection of the Government's economic growth and infrastructure priorities.

0.001

Yours sincerely,

Hon Chris Bishop
Minister for Infrastructure

(No subject)

From Paul Aylett [REDACTED]
Date Sun 9/08/2026 8:09 PM
To FastTrack Substantive <substantive@fasttrack.govt.nz>

I have been invited to comment on the above project.

Paul
Aylett

[REDACTED]
[REDACTED]
[REDACTED]

I can receive emails and my email address is correct.

We have lived at [REDACTED] [REDACTED] for over 20 years and have learned to live with the quarry when it moved closer to us with the establishment of the new pit. We were attracted to the area by the quiet rural nature of the area and by the quality of the bush in the Ponga Road Forrest. I work in conservation and regard the native forest to be of high ecological value. I would like to ensure that the pest management program is maintained and expanded to include the control of browsing animals.

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Our number one issue is the noise which at times is of concern. We would like to ensure that the hours worked and the decibel level in the pit and haul road are not extended beyond the current hours worked. We do not hear or see the crusher so that is of no concern to us. Those of us that live high up on the hill to the south may receive more noise than the monitoring station in our direction, which is situated low down in the Judge Richardson subdivision. I would like this issue to be considered.

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We have no problem with the quarry other than noise but would like to ask that the visual impact be kept to a minimum with planting. Even grasses in some areas would lessen the impact even if temporary. There may be many years before some areas are disturbed again.

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Paul Aylett

Submission on the Winstone Aggregates Hunua Quarry Fast Track Application

Property: [REDACTED]

Submitter	Gavin and Rebecca Giles-Owners and occupiers of [REDACTED]
Property	[REDACTED]
Application	Winstone Aggregates Hunua Quarry Fast Track Application

1. Introduction and Property Context

We are the owners and occupiers of [REDACTED] and submit the following concerns regarding the proposed expansion of Hunua Quarry under the Fast Track Approvals process.

This submission is based on the application documents, previous correspondence with Winstone Aggregates, and the environmental and operational impacts already experienced by neighbouring residents.

Our property is one of the few remaining privately owned residential properties adjacent to the proposed expansion area. A significant concern is that many neighbouring properties have already been acquired by Winstone/Fletcher interests and no longer function as independent residential dwellings.

As quarry operations progressively move closer to our property boundary, our property may become increasingly isolated and exposed to direct quarry effects without the buffering previously provided by neighbouring residential occupation. The application does not clearly explain how the environmental and amenity effects on [REDACTED] [REDACTED] will be managed as quarry operations advance towards our boundary.

Key concern: The application appears to rely heavily on technical compliance limits, but it does not provide sufficient property-specific certainty for the remaining residents who will live alongside the quarry over the long term.

2. Dust Effects

The proposed expansion will involve a larger extraction area, increased material movement, crushing, processing activities, internal haulage, and truck movements. These activities have the potential to generate dust, particularly during dry and windy conditions.

Of particular concern is the potential for dust to affect:

- residential amenity and enjoyment of outdoor living areas
- the cleanliness and maintenance of homes, vehicles, water tanks, and other property improvements
- human health and wellbeing, particularly for sensitive persons
- vegetation, gardens, pasture, and stock grazing areas

The application does not provide sufficient assurance that dust effects will remain acceptable as quarry operations expand closer to surrounding properties over time. Ongoing property specific independent monitoring, transparent reporting, and enforceable response measures should be required where dust effects are greater than predicted or where complaints are received.

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3. Operational Noise Effects

The proposed expansion will increase the duration and scale of quarry activities, including excavation, crushing, screening, loading, internal haulage, and truck movements. While the acoustic assessment may predict compliance with applicable standards, compliance alone does not necessarily protect residential amenities.

Residents living near the quarry already experience quarry-related noise. The expansion has the potential to increase:

- daily noise exposure
- the audibility of quarry operations within homes and outdoor living areas
- disturbance to the quiet rural character of the area
- the cumulative effects of machinery, reversing alarms, truck movements, drilling, and blasting

The application should place greater weight on preserving the amenity values of established rural residential properties, rather than relying solely on compliance with technical noise standards. Residents should not be expected to accept a progressive decline in amenity as quarry activities intensify or move closer to property boundaries.

4. Blasting, Vibration and Blast Overpressure

We are particularly concerned that the application has not adequately demonstrated how the long-term effects of blasting, vibration, and blast overpressure on [REDACTED] will be avoided, remedied, or mitigated.

The proposal involves continued drilling and blasting over an extended period as the quarry expands and deepens. Specific concerns include:

- potential damage to buildings, foundations, retaining walls, driveways, water infrastructure, and other improvements
- blast overpressure and vibration effects on residents
- the frequency, duration, and intensity of future blasting as quarry faces move closer to neighbouring properties
- the adequacy and location of vibration monitoring equipment
- whether monitoring results accurately reflect the effects experienced at residential dwellings
- the need for transparency where monitoring equipment has been relocated or where monitoring locations may not represent the effects at our property

Of additional concern is that neighbouring Fletcher-owned properties are not subject to the same residential sensitivity considerations. This has the potential to reduce the level of practical protection afforded to the remaining independent landowners.

Repeated vibration and blast overpressure events may create ongoing concern for residents, particularly where there are fears of structural damage, cracking, land movement, or impacts on water infrastructure and other property improvements. Current blasting activities at Hunua Quarry already generate vibration effects at [REDACTED] that can feel comparable to a small earthquake, with noticeable shaking of the house, rattling of cupboards and household contents, and visible disturbance to domestic animals. While these effects may fall within technical compliance limits, they nonetheless have a significant impact on residents' sense of wellbeing, security, and enjoyment of their property. The application does not adequately demonstrate how these effects will be avoided or reduced as quarry operations progressively deepen and move closer to neighbouring properties, nor does it provide certainty that the frequency or intensity of these events will not increase over the life of the proposed expansion.

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5. Future Expansion and Loss of Residential Buffering

A key unanswered question is what protections will remain for us as the occupants of [REDACTED] as the quarry progressively advances toward our property and surrounding properties cease to operate as occupied residences.

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I request that Winstone clearly explain:

- how [REDACTED] will remain protected if quarry operations ultimately approach our boundary
- what criteria are being used to determine whether neighbouring properties remain suitable for residential occupation
- whether equivalent assessments have been or will be undertaken for our property
- what mitigation, compensation, or protective measures are proposed for directly affected neighbouring landowners

6. Requested Conditions

If the application is approved, we respectfully request that the approval be subject to robust and enforceable conditions that include:

1. Property-specific dust, noise, vibration, blast overpressure, and air quality protections for [REDACTED].
2. Independent environmental monitoring is located at or immediately adjacent to our property.
3. Public reporting of monitoring results, including dust, noise, vibration, and blast monitoring outcomes.
4. Independent property condition surveys before further expansion, with periodic follow-up surveys as quarry operations move closer to residential boundaries.
5. Clearly defined trigger levels requiring investigation, corrective action, and review of mitigation measures.
6. Transparent complaints, investigation, and dispute resolution process.
7. Compensation and remedial measures where quarry operations cause property damage, loss of amenity, or adverse environmental effects.
8. Periodic reassessment of environmental effects and mitigation measures as quarry operations progress through future stages of development.

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7. Conclusion

We are not opposed to the continued operation of Hunua Quarry and acknowledge its importance to Auckland's infrastructure and economic development. However, the benefits of the project should not come at the expense of the health, wellbeing, amenity, and property rights of the small number of neighbouring residents who will continue to live alongside the quarry for decades to come.

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The Fast Track process must not result in remaining residents being left with uncertainty about long-term exposure to dust, noise, vibration, blast overpressure, and other quarry effects. The burden of managing those effects should not fall on neighbouring landowners.

We request that the Expert Panel either decline the application or impose meaningful, enforceable, and enduring conditions that provide certainty that the occupants of [REDACTED] will be protected from the adverse effects of dust, noise, vibration, blasting, and future quarry expansion throughout the life of the development.

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IN THE MATTER of the Fast-track Approvals Act 2024 (“**FTAA**”)

AND

IN THE MATTER of an application for resource consents, wildlife approvals, archaeological authority and complex fish passage approvals under the FTAA by Winstone Aggregates for the **Hunua Quarry Development** (FTAA-2603-1185)

MEMORANDUM OF PLANNING MATTERS FOR AUCKLAND COUNCIL

Dated: 11 August 2026

SECTION A: INTRODUCTION

1. This Planning Memorandum (**Memorandum**) sets out Auckland Council’s statutory planning assessments of the Substantive application for the Hunua Quarry Development project (**Application**) lodged by Winstone Aggregates (**Applicant**) under the FTAA, and a summary of assessment outcomes and proportionality conclusions.
2. Section 53(2) of the FTAA identifies relevant local authorities as a party from whom comments on a Substantive application must be invited. Auckland Council are the relevant local authority for this proposal. In response to the FTAA, and the statutory roles and responsibilities of the territorial authority, Auckland Council have established a process whereby the response to any invitation to comment under s53(2) for Substantive applications seeking resource consent and/or designation type approvals is led by the Planning and Resource Consents Department. FTAA projects (Listed or Referral) are allocated to a specific Principal Project Lead within the Premium Unit - Planning and Resource Consents Department, and a qualified Planner who coordinate and lead this regulatory response on behalf of Auckland Council. Separate to the process under s53(2), Auckland Council elected representatives and/or managers may make public comments in support or opposed to Fast Track applications.
3. This **memorandum** has been prepared by Ms Emma Chandler, Consultant Planner for Auckland Council and reviewed by Mr Warwick Pascoe, Principal Project Lead for Auckland Council, and is provided in response to the invitation to comment issued by the Expert Panel (**Panel**) under s53(2) of the FTAA on 13 July 2026.
4. In addition, there are sixteen accompanying annexures as follows, which are referred to throughout this memorandum:
 - a. Development Engineering and Geotechnical – Maria Baring and John

Newsome (**Annexure 1**)

- b. Groundwater and Dewatering – Nick Hazard (**Annexure 2**)
 - c. Traffic Engineering – Philips Augustine (**Annexure 3**)
 - d. Auckland Transport – Nagaraj Prabhakara (**Annexure 4**)
 - e. Air Quality – Dr Louis Boamponsem (**Annexure 5**)
 - f. Streamworks and Freshwater and Terrestrial Ecology – Andrew Rossaak (**Annexure 6**)
 - g. Landscape and Visual Amenity – Simon Cocker (**Annexure 7**)
 - h. Noise and Vibration – Duffy Visser (**Annexure 8**)
 - i. Regional Earthworks – Steve Bryant (**Annexure 9**)
 - j. Economics – Rodney Yeoman (**Annexure 10**)
 - k. Policy – Matt Gouge (**Annexure 11**)
 - l. Watercare Services Limited – Chloe Jacobs (**Annexure 12**)
 - m. Contaminated Soils – Marie Meredith (**Annexure 13**)
 - n. Parks Planning – Andrew Miller (**Annexure 14**)
 - o. Stormwater – Hillary Johnstone (**Annexure 15**)
 - p. Archaeology – Joe Mills (**Annexure 16**)
 - q. Local Board – Franklin Local Board (**Annexure 17**)
5. The annexures of specialist and asset owner inputs including from the Council Controlled Organisations (**Annexures 1-16**) have generally been provided as memoranda using a consistent format for ease of review and reference. Departures in format include where matters of assessment are of a relatively reduced scale.
6. We are aware that the Panel have also directly invited comments under s53(2) of the FTAA from Auckland Transport (**Annexure 4**) and Watercare Services Limited (**Annexure 12**). Auckland Transport and Watercare Services Limited have confirmed that they have provided the responses contained within the identified annexure direct to the Panel in response to their invitation for comment.
7. In addition to the annexures from specialists and asset owners we have also included a response received from the Franklin Local Board (the Applicant site being included in the Franklin Local Board Area) on the project at **Annexure 17**.
8. The Application includes a set of recommended draft conditions which have been amended since lodgement with an updated set supplied on 22 June 2026. We have reviewed these latest conditions as part of our assessment of this application, and recommendations are made throughout this Memo and the supporting Annexures for suggested changes or additions to these conditions where appropriate. We would be happy to compile a tracked change document outlining the Council family's suggestions and additions to the proposed conditions to assist in any subsequent condition conferences or discussions but have not had sufficient time to compile this document in time for inclusion in this response.
9. For process clarity, this assessment is based on the Application as at 13 July 2026, which includes:
- a. The Application materials contained within the Substantive Application

lodgement issued by the Environmental Protection Agency as the accepted substantive application;

- b. The updated application documents submitted on 22 June 2026; and
 - c. Minor additional information or clarifications provided at meetings, via email or in discussions with the Applicant team.
10. Where possible, we have also accommodated minor additional information or clarifications provided at meetings, via email or in discussions with the Applicant team after the 13 July 2026. Where such information has been accommodated in our final feedback this has been specifically referenced throughout.

Qualifications and Relevant Experience

Emma Chandler

11. Emma Chandler is an Associate Planner at Sentinel Planning Limited. Emma holds the qualification of Bachelor of Planning and has twelve years of planning experience. Emma is an intermediate member of the NZPI and has prepared expert evidence and technical assessments for resource consent applications, and has appeared as an expert witness before consent authorities.
12. Emma's experience that is relevant to this application includes processing resource consent applications throughout the Auckland region, including those involving quarries, and consents involving similar land uses, streamworks, diversion and discharge in relation to freshwater and wastewater, and groundwater diversions and takes. This includes providing planning input on behalf of Auckland Council on Fast-Track applications.

Warwick Pascoe

13. Warwick Pascoe is a Principal Project Lead in the Premium Resource Consents Unit of Auckland Council. Warwick holds a Bachelor of Science (Hons) in geology, and has 29 years resource management experience as a planner, team leader and project lead in Local Government, and as a managing director of both an environmental consultancy and water allocation brokerage.
14. Warwick's experience that is relevant to this application includes overseeing the processing of, and making decisions on, numerous resource consent applications throughout the Auckland region for major projects such as City Rail Link, Auckland Regional Landfill, Eastern Busway, Central Interceptor and several quarries.

Code of Conduct

15. Warwick Pascoe and Emma Chandler confirm that they have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (Code), and have complied with it in the preparation of this assessment. They also agree to follow the Code when

participating in any subsequent processes, such as expert conferencing, directed by the Panel. They confirm that the opinions they have expressed are within their area of expertise and are their own, except where they have stated that they are relying on the work or evidence of others, which they have specified.

SECTION B: HISTORY AND BACKGROUND

16. The Applicant has provided a detailed summary of the background of Hunua Quarry in Section B2 of the submitted Assessment of Environmental Effects (AEE) prepared by Boffa Miskell. We do not propose to repeat that summary here, and have no further comments to add.

SECTION C: STATUTORY PLANNING ASSESSMENT

17. The Council Memos and other relevant forms of advice listed in **Section A** above inform the overall Statutory Planning Assessment. These have been provided in annexures in their complete form for the benefit of the Panel and their review and assessment on specialist matters.
18. The Franklin Local Board comments are not specifically discussed in this **Section C** but are provided at **Annexure 17** for the Panel's consideration.

Outstanding Material from Applicant, and Review Limitations

19. As noted in **Section A**, we have only reviewed information submitted by the Applicant by 13 July 2026 and listed subsequent information provided in response to direct queries from relevant specialists.
20. The draft proposed conditions have been reviewed and commented on within the respective specialist memos and throughout this planning memo. Discussions with the applicant on conditions have been undertaken since lodgement, with various updated versions of draft conditions having been submitted by the applicant to the Panel on 22 June 2026 and 14 July 2026. The specialist memos that support this memo have, as a result, reviewed various versions of the condition set. The reviewed version of conditions has been identified in the respective memos. In many instances there have been discussions since the finalisation of the specialist memo on conditions and the status of Councils position on the various conditions has developed. As such, compiled comments on conditions have been included in Section D of this response.

SECTION C.1 EFFECTS ASSESSMENT

Earthworks (sediment and erosion)

Applicant's Assessment

21. MPD Environmental Limited (on behalf of the Applicant) has provided a description of the proposed erosion and sediment control measures for the bulk earthworks in the Erosion and Sediment Control Report.
22. The Applicant has confirmed that the proposed ESCP will be a working document that is anticipated to evolve over time to respond to changing ESCP principles, legislation and consent requirements over the lifetime of the consent. The ESCP (including all updates) is proposed to be certified through consent conditions and will be implemented throughout the earthworks operation. The proposed ESCP measures include Sediment Retention Ponds (SRP), Decanting Earth Bunds (DEBs), Silt Fences (SFs), Super Silt Fences (SSFs), Dirty Water Diversions (DWDs), Clean Water Diversions (CWDs), and a Stabilised Construction Entrance. Chemical Treatment (flocculation) of the sediment control devices is also proposed via a Chemical Treatment Management Plan (ChTMP).
23. Works methodologies for the various elements of streamworks have been clearly detailed in the ESCP insofar as they relate to necessary sediment and erosion control measures. This includes options for both online and offline diversion methodologies.

Council's Assessment

24. The adverse effects (sedimentation) associated with the earthworks have been reviewed by Council's Regional Earthworks Specialist (**Annexure 9**) who has confirmed that the proposed erosion and sediment control measures are generally appropriate, and that the preparation of final staging plan and ESCPs for certification by Council is acceptable. 0.285
25. The recommended conditions of consent are considered appropriate and fit for purpose.
26. It is noted that a consent condition for a maximum duration of 35 years with a seasonal restriction for the earthworks has been sought by the applicant, and this is considered appropriate in this case. 0.286

Conclusions on Sedimentation Effects

27. Overall, the proposed works can be suitably managed by the proposed sediment and erosion control measures, subject to adherence to the proposed and recommended changes to consent conditions.
28. There are no significant residual sedimentation impacts that require proportionality assessment. 0.287

Geotechnical and Land Stability

Applicant's Assessment

29. A Geotechnical Report has been prepared by Tonkin and Taylor and lodged with the Application. This includes a range of recommendations for the quarrying activities to ensure that slope stability is appropriately maintained throughout works. These

recommendations form part of the Application.

30. The geotechnical report and AEE also confirm the site is subject to Low (Acceptable) landslide hazard risk pursuant to PC120, and as such that consents are not required.

Council's Assessment

31. Council's Geotechnical Engineer and Development Engineer (**Annexure 1**) have reviewed the proposed earthworks in respect to the geotechnical matters including land stability. There is broad agreement with the assessments undertaken and conclusions reached that the site is generally stable and suitable for the proposed quarrying activities, and stability can be suitably managed throughout works in accordance with the recommendations made by Tonkin and Taylor and the recommended conditions of consent.
32. Council concur with the applicant's assessment with respect to landslide hazards.

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Conclusions on Geotechnical and Land Stability Effects

33. There is broad agreement between the Applicant and Council in respect to geotechnical and land stability related effects.
34. Provided the recommended additional conditions are imposed, there are no significant Geotechnical and Land Stability impacts that require proportionality assessment.

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Groundwater Diversion & Dewatering Effects

Applicant's Assessment

35. The Applicant is seeking consent to take groundwater for dewatering and diversion purposes during quarrying activities, and in the long term for ground dewatering during the quarry operation.
36. A comprehensive groundwater effects assessment has been undertaken by PDP in the Technical Report submitted with the Application. A Groundwater Monitoring and Contingency Plan has already been prepared by PDP supporting the application. This is proposed to be conditioned to enable a finalised version to be prepared and certified by Council prior to works commencing, and to enable amendments to the document over the lifetime of the consent to allow adaptive management to varying conditions.

Council's Assessment

37. Council's Groundwater Specialist has reviewed the Application (**Annexure 2**), and has confirmed that, while there are areas of disagreement with the methodology and detail of the submitted assessment of effects prepared by PDP, subject to the proposed consent conditions (with minor final amendments), groundwater effects can be appropriately managed/ mitigated to the extent that adverse effects would be less than

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minor (i.e. not significant).

38. The conditions relating to groundwater matters has been an on-going point of discussion to tidy up through consultation with the applicant to date. Generally, the conditions have been agreed to between parties, however there are some minor final amendments recommended by Council's Groundwater specialist as detailed in their memo.

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Conclusions on Groundwater Effects

39. There is broad agreement between the Applicant and Council in respect to groundwater-related effects.
40. There are no significant residual groundwater impacts that require a proportionality assessment.

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Stormwater

Applicant's Assessment

41. The application seeks discretionary consent for private stormwater discharges from the on-going quarrying activity and for the taking, use damming or diversion, and the discharge of water, within 100m of natural inland wetlands.
42. The proposed management of effects relies on an integrated approach incorporating stormwater treatment, erosion and sediment control, quarry dewatering, stream flow augmentation, and operational management measures implemented through management plans and proposed consent conditions.

Council's Assessment

43. Council's Stormwater Specialist (**Annexure 15**) has reviewed the proposal with respect to the stormwater management approach.
44. Some minor information insufficiencies have been identified by Council's Stormwater Specialist, however these primarily relate to flooding effects and as such are discussed in more detail below.
45. The specialist has requested confirmation of whether the application includes ancillary activities that would require consent under Chapter E33 of the AUP (Industrial and Trade Activities). It would be beneficial to have this formally confirmed, however the applicant has not applied for any associated activities, and as such Council are comfortable that this does not form part of this application and can proceed on that basis.
46. Council's Stormwater specialist has confirmed that, subject to minor amendments to conditions of consent, they are overall satisfied that the proposed stormwater management approach is appropriate and are able to support the application.

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Conclusions on Stormwater

47. Adverse effects associated with stormwater management (excluding flooding, which is considered separately below) will be appropriately managed through the proposed management approach via suitable management plans and conditions.
48. There are no significant residual impacts on stormwater that requires proportionality assessment.

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Overland Flow Paths and Flooding

Applicant's Assessment

49. PDP have completed an assessment of flood risks associated with the proposed development in the submitted Flood Risk Assessment Report and Mangapū Tributary Realignment – Preliminary Design and Effects Technical Assessment submitted with the application. This largely focuses on the risks and effects associated with the proposed culverts for the haul road, but includes brief comment on overland flow, watercourses and associated flood plains within the expansion area itself.
50. PDP conclude that the design of the culverts has appropriately taken into account the flood hazards of the site to mitigate localised effects, and that all flood hazards within the quarry pit extent will be effectively removed as a result of the quarrying activities.
51. The Mangapū Tributary Realignment assessment concludes that the proposed stream realignment will result in increases in flood levels of up to 50 mm within land owned by the Applicant, and up to 15 mm within rural residential areas, with no effects on existing buildings.

Council's Assessment

52. Council's Development Engineer (**Annexure 1**) and Stormwater Specialist (**Annexure 15**) have reviewed the proposal with respect to potential flooding effects from the overall works package. Both are satisfied that the identified changes to downstream flood levels are acceptable, provided they are limited to the extent detailed in the application package. Given this is reliant on a preliminary channel design associated with a challenging construction environment, conditions have been offered by the applicant to ensure the final hydraulic design limits flood effects to no greater than those detailed in the application. Further amendments are therefore suggested by Council's Stormwater Specialist to these conditions to require verification of the flood effects required by the offered conditions based on as-built information to provide further certainty around the delivery of these outcomes.
53. With respect to the proposed culverts, Council's Stormwater Specialist has commented that there is currently insufficient assessment of the performance of the proposed culverts in blockage conditions with the application package. This has the potential to generate downstream flooding effects that are not consistent with the conclusions

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reached in the submitted flood assessment if flood flows would overtop the haul road in such a situation. Further information is recommended via a s67 FTAA request in this regard to ensure that the potential downstream flooding impacts are fully understood.

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54. Council's Development Engineer (**Annexure 1**) has reviewed the proposal with respect to the management of overland flows through works, and is satisfied that the proposal can appropriately manage overland flows through the site without resulting in any diversions to the entry or exit points from the site. Amendments to the Stream Rehabilitation Management Plan condition of consent are recommended to require the Applicant to demonstrate to Council that those works will be suitably managed to ensure potential adverse upstream ponding or flooding effects are avoided throughout the duration of works.

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Conclusions on Overland Flow Paths and Flooding

55. There is currently uncertainty as to the accuracy of this assessment. Further information is therefore recommended to be requested with respect to the design of the proposed culverts and their performance during blockage scenarios. This would clarify whether the predicted attenuated flood waters remain confined behind the culvert within the gully system, or whether there is any increased risk of overtopping of the haul road embankment in larger events, leading to potential downstream flooding impacts.

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56. Council recommend that this be resolved via a s67 request to provide adequate certainty both with respect to downstream flooding effects, and the ability to implement the consent as proposed. Council do recognise that there likely would be design solutions to ensure that the culverts and haul road are designed to avoid such overtopping, and as such this could be resolved via a condition of consent. Such a condition should require detailed design to be provided to Council with the final culvert & haul road design for certification that demonstrates that no overtopping would occur.

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57. As such, if the Panel is satisfied that there is adequate certainty in the information provided with respect to flooding effects at this stage, then the effects can be suitably managed via conditions.

58. Subject to amendments to and additional conditions of consent, there are therefore no significant residual flooding effects that require proportionality assessment.

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Noise and Vibration

Applicant's Assessment

59. Styles Group has undertaken an assessment of the noise and vibration effects in the Noise Assessment Report provided with the Application. Styles Group conclude that the proposal will comply with the permitted construction and quarrying noise and vibration standards in both the Special Purpose Quarry Zone (SPQZ) and the Rural Production Zone (RPZ).

60. Effects on persons of 369, 397, 411, 480-486, and 490 Hunua Road; 105, 106, 108, 115, 118, 119, and 195 Judge Richardson Drive; and 161, 163, 165, 167, 180, 193, and 255 Middleton Road, have been disregarded in the Styles Group assessment as written approvals of affected persons have been provided.
61. Style Group have recommended noise and vibration conditions for blasting in the SPQZ that they consider to be better controls than the AUP standards. They comment that these conditions will “reduce potential effects on the neighbouring residents by applying overpressure limits at all receivers rather than only at sites where dwellings existed at 1 January 2001.”
62. An Operational Noise and Vibration Management Plan (QNVMP) has also been prepared for the management of effects. Styles Group have concluded that “adopting these recommendations will ensure that operational noise does not cause unreasonable disruption to rural residential activities during the day, or sleep disturbance at night for any existing or future receivers outside the SPQZ.”

Council's Assessment

63. The noise and vibration effects including on neighbouring properties have been reviewed by Council's Acoustic Specialist (**Annexure 8**) who has confirmed they are in broad agreement with the Applicant that all works can be carried out in accordance with the permitted standards, provided the mitigation measures suggested by the Applicant are adhered to. 0.304
64. The proposed conditions of consent are generally appropriate in the opinion of Council's Acoustic Specialist. Of note with respect to the recommended changes detailed in Annexure 8:
 - a. This review of conditions was undertaken on the lodged version of conditions.
 - b. Council's Acoustic specialist has recommended deletion of the Operational Noise Management Plan conditions, now at conditions 35 and 36. This deletion has not been accommodated into the 14 July 2026 version of conditions. From a planning perspective I can confirm that I agree with retaining this condition to enable this document to be finalised and certified, and to enable a suitable process for adaptive changes to this document over time as required. 0.305
 - c. The recommended changes to the Blasting Noise and Vibration condition (now condition 90) have been accommodated in the revised condition set. This has been agreed with the Applicant. 0.306
 - d. There is one minor additional advice note recommended that hasn't been accommodated into the updated condition set. This has been reflected in Section D.3 below for completeness. 0.307

Conclusions on Construction Noise and Vibration

65. Adverse construction noise effects can be appropriately addressed through the offered conditions.

66. There are no significant residual construction noise and vibration impacts that require proportionality assessment.

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Air Quality

Applicant's Assessment

67. PDP have undertaken an assessment of the discharge of contaminants to air (dust) associated with the proposed quarrying activities. This concludes that the proposed extraction rate is within the controlled activity limits of the AUP (Rule E14.4.1 (A90)) where within the SPQZ and that the relevant controlled activity standard at E14.6.2.2 is met given the separation distance to the closest dwelling from the proposed crushing activity. Discretionary consent is sought for extraction rates within the MRZ (E14.4.1 (A91)).
68. An Air Quality Management Plan has also been developed detailing the proposed management measures that will be implemented to manage the proposed discharges from the proposed activities.

Council's Assessment

69. The air quality matters have been reviewed by Council's Air Quality Specialist (**Annexure 5**) who agrees with the conclusions reached in the Applicant's assessments and that the proposed dust management plan incorporates appropriate measures to control the potential adverse effects associated with the proposed discharges.

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Conclusions on Contamination

70. Adverse air quality effects can be appropriately addressed through the offered management plans and conditions.
71. There are no significant residual air quality impacts that require proportionality assessment.

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Contaminated Land

Applicant's Assessment

72. PDP have undertaken Preliminary and Detailed Site Investigations for the subject site and proposed developments. These identify that there are areas of potential contamination in the northern section of the pit development area where quarrying is proposed in Stages 7 and 8 (approximately 35-50 years in the future).
73. Conditions of consent are proposed to require a further Detailed Site Investigation for Stages 7 and 8 prior to works commencing in these areas, to determine the need for consents if future works (relating to contamination) are not already provided for by the

controlled activity consent sought at this stage.

Council's Assessment

74. The contaminated land matters have been reviewed by Council's Contaminated Land Specialist (**Annexure 13**) who agrees with the conclusions reached in the Applicant's assessments.
75. They have recommended a condition of consent requiring a works completion report to be prepared, which has been agreed to by the applicant, and accommodated in the latest version of recommended conditions dated 14 July 2026.

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Conclusions on Contamination

76. Adverse contaminated land effects can be appropriately addressed through the offered management plans and conditions.
77. There are no significant residual contaminated land impacts that require proportionality assessment.

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Transport

Applicant's Assessment

78. Commute have undertaken an assessment of traffic effects from the proposal in the submitted Transportation Assessment. This details the following key elements of the proposal and site context:
- a. Hunua Road to the west of the site entrance and through to Settlement Road, Settlement Road, and Beach Road are all part of the Auckland Strategic Freight Network;
 - b. A total of 15 crashes have been reported in the five-year period between 2021 and 2025. The crash history does not highlight any significant safety concerns or trends relating to the Quarry Entrance or quarry trucks;
 - c. The proposal is anticipated to result in a 111% increase in average daily truck movements – an increase in morning peak from 76 to 161, and in afternoon peak from 64 to 135. Staff movements are not anticipated to change;
 - d. Upgrades are proposed to the site entrance and vehicle crossing. This includes the establishment of a full right turn bay, 'squaring' up the access to be 90 degrees with Hunua Road, provision of 40m stacking distance for the right turn bay (two trucks), provision of a central solid splitter island at the entry, sealing the access for at least the first 50m of the site, provision of an after-hours gate set back 50m from the site entrance, and retention of existing trucks crossing signage.
79. It is also noted that a new internal haul road is proposed within the site. This hasn't been specifically commented on in Commutes' assessment, however it is understood that this

will only be accessible by quarry operators, and internal traffic management measures will be utilised to manage use and safety of this haul road.

Council's Assessment

80. Council's Traffic Engineer and Auckland Transport (AT) have reviewed the proposed application (**Annexures 3 and 4**) in relation to transport effects.
81. Council's Traffic Engineering review has focussed on AUP transport provisions, while Auckland Transport have focussed on the wider roading network aspects.

Internal Transport Effects

82. Council's Traffic Engineer (**Annexure 3**) has identified a range of information that would be beneficial to be provided at this stage to demonstrate that the on-site access arrangements are functional and safe. This includes lighting details and more detailed design drawings of the proposed new internal haul road.
83. With respect to lighting, the applicant has confirmed that existing lighting will be retained, and where any upgrades may be required to comply with the relevant lighting requirements of the AUP these will be provided. A condition of consent has been offered to this degree, which is considered sufficient to address on-site lighting requirements.
84. With respect to the design of the internal haul road, the applicant has advised that this will be only utilised by quarry operators and there will be no general public access/use of this road. On-site truck movements are currently managed by quarry management procedures and will continue to be managed accordingly. On-site management is considered appropriate for an activity of this nature to ensure safety is maintained internally within the site.

Roading Effects

85. 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:

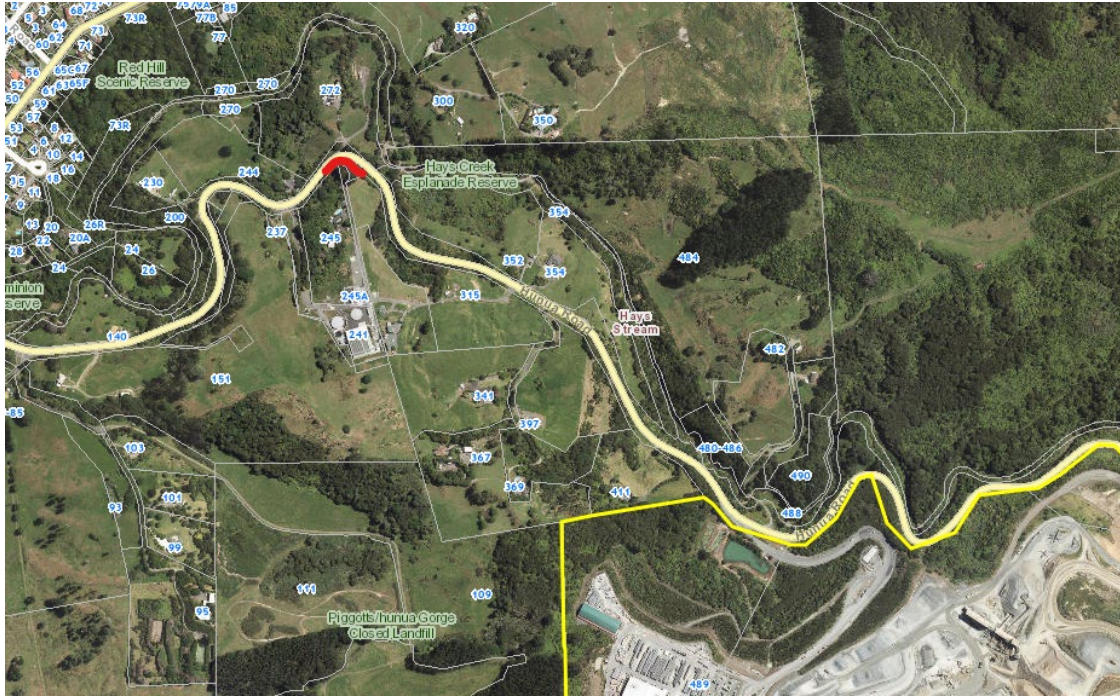


Figure 1: Aerial image showing subject site (outlined in yellow) and area of concern raised by Auckland Transport (red).

86. 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.
87. 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.
88. The applicant's position on this matter is understood to be that this is an existing issue with the roading network that is not directly related to quarrying activities. The crashes were caused by private vehicles crossing the centre line, not quarry trucks. The applicant has noted that the road in this location is part of the Auckland Strategic Freight Network and therefore that 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 is large trucks and trailers." This notwithstanding, the applicant has offered an Augier condition to install audio-tactile (ATP) markings (rumble strips) at this location to warn drivers if they cross the centre line.
89. 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

0.318

0.319

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).

90. Delivering Auckland Transport's 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. 0.320
91. 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. 0.321
92. 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. 0.322
93. With respect to all other comments from Auckland Transport on conditions in **Annexure 4**, Council confirm that the current drafted conditions dated 14 July 2026 are agreed upon between Council and the Applicant. 0.323

Conclusions on Transport effects

94. Council's Traffic Engineer supports the proposal noting he has deferred assessment of effects on roading infrastructure to Auckland Transport. 0.324
95. Auckland Transport are not supportive of the proposal in its current state, considering there are safety effects of concern along Hunua Road with the increased trip generation the proposal would generate. They have recommended amendments to the recommended conditions of consent to require relatively significant upgrade works to the key corner of concern along Hunua Road, which Council overall accept is not an appropriate matter to condition and instead recommend that further information is requested via a s67 request to allow a better understanding of potential effects from the proposal in this regard. 0.325
96. There are potentially significant adverse effects on road safety and efficiency from the proposal, and as such it is considered appropriate that a proportionality assessment be undertaken. See **Section D** below. 0.326

Ecology

Applicant's Assessment

97. An Ecological Impact Assessment prepared by Boffa Miskell has assessed the adverse effects on ecology values. This has included assessments of both freshwater and terrestrial ecological matters.
98. The Ecological Impact Assessment details that the proposed works will:
- a. Clear a total of 44.46ha of native forest and 4.15ha of exotic vegetation;
 - b. Reclamation of 0.22ha of wetland features;
 - c. Reclamation of a total of 1,727m of stream, part of which will be from the diversion of the Mangapū Tributary, resulting in a total extent of stream loss of 1,157m.
99. The application proposes to offset and compensate for this loss by restoration works at three offset sites – the Quarry Site, Meremere Site, and Hunua Regional Park Site. The proposed offset and compensation package is summarised as:
- a. Offset of 44.5ha of planting around the quarry site, 21ha at Meremere, and more than 20ha at Hunua Regional Park. This includes covenant protection of the planting at the Quarry and Meremere sites, noting that covenants cannot be placed on the planting at the Hunua Regional Park site given it is Auckland Council Parks land;
 - b. Compensation in the form of 16.3ha of enhancement to existing vegetation.

Council's Assessment

100. Council's Ecologist has reviewed the proposed application (**Annexure 6**) for potential effects on Freshwater and Terrestrial Ecology. This has been supported by on-going discussions with the Applicant's ecology team through the consultation process to date.
101. Council's ecological assessment has identified a number of key outstanding technical matters with the submitted ecological assessments, as follows:
- a. The BOAM model used to calculate the requirements for offset and compensation has raised a number of questions that creates uncertainty in the output. These would be likely to increase the offset requirements for the proposed development.
 - b. The application relies on the fact that the proposed stream realignment will deliver an outcome that wholly maintains the existing ecological values of the impacted watercourse. There are questions on the reasonableness of this conclusion, which would result in an unaccounted for loss in stream value in the offset and compensation package.
 - c. The timing of the assessments undertaken for classifying the affected

0.327

watercourses is largely outside the Council's timing window. The impact of this is that the extent of stream classified as intermittent that is to be reclaimed may be underestimated, and in turn calling into question the accuracy of the offset and compensation package.

- d. There are questions around the extent of benefits achieved at the Meremere Site. Further, this is not considered to meet the criteria for offset in Appendix 8 (3) of the AUP, and should be considered compensation.

102. Cumulatively, these matters all contribute to an unresolved question as to the extent of offset and compensation provided in the application, and whether this adequately addresses the ecological effects of the proposal.

0.328

103. These matters have been part of the on-going consultation to date, and a resolution has not yet been reached. It is understood that the Applicant considers the calculations are all appropriate and accurate.

0.329

104. It is unclear to what extent the application of the BOAM as discussed would practically alter the calculated offset extent, however Council's ecologist concludes that the information to date lacks the detail required to provide confidence in its calculated extent.

105. There is therefore an outstanding concern that the ecological effects of the proposal have not been adequately addressed, and there will be potentially significant residual ecological effects. It is recommended that further information is requested in this regard via a s67 request, as given the potential implications for the extent of offset and compensation this would be challenging to adequately manage via conditions of consent.

0.330

106. The Ecologist (along with other Council specialists) has additionally flagged the challenging nature of the stream diversion and the realistic delivery of the outcomes proposed. This will require thorough management plans and maintenance approaches to ensure the outcomes are delivered. Recommendations have been made to strengthen the conditions of consent in this regard. We would encourage the Panel to satisfy themselves that these works can be reasonably undertaken and deliver the outcomes put forward in the application package.

0.331

107. Council's Ecologist has also confirmed that, from an ecological perspective, the proposed sediment and erosion control measures and augmentation of flows to manage potential effects from dewatering are generally appropriate. Minor changes to conditions of consent are recommended, however, to ensure any potential effects are suitably avoided and/or mitigated.

0.332

Conclusion of Ecology Effects

108. Overall, there remain unresolved concerns with the proposed effects-management package and as such there are residual adverse effects that are not considered to have been adequately addressed by the application in its current form. For completeness, it

is noted that this arises from the adequacy of the effects management package as presented, not the project in principle. The deficiencies in the information are capable of resolution through a combination of further information and amendments to the proposed conditions.

0.333

109. In its current form, there are unresolved adverse effects from the proposal that have the potential to be significant. The scale of such residual effects is dependent on the effect the inadequacies in the assessment would have on the scope of the necessary offset and compensation package, and as such cannot be confirmed at this stage. As such it is considered appropriate that a proportionality assessment be undertaken. See **Section D** below.

0.334

Landscape and Visual Effects

Applicant's Assessment

110. Boffa Miskell have prepared a Landscape and Visual Effects Assessment for the proposed expansion and supporting visual simulations.
111. The assessment concludes that the proposal will introduce notable and long-term changes to landform, vegetation patterns and the Mangapū Stream Tributary, but that the effects are largely contained within the Site and its immediate surrounds. The Applicant's assessment details that the proposal will occur within, and remains legible as part of, a working rural landscape and opines that the amenity effects will be addressed through containment, staging and mitigation. Nevertheless, localised adverse effects would be moderate-high in extent and mitigated by the proposed remediation planting which will gradually reduce long-term landscape, natural character and visual effects.
112. The landscape and visual effects have also been assessed in the AEE prepared by Barker & Associates, who have considered some landscape character effects and visual amenity effects will remain more than minor following mitigation, but these effects will not be significant.

Council's Assessment

113. The Application has been reviewed by Council's Landscape Architect (**Annexure 7**).
114. The proposal involves the removal of ridges and hillslopes within the ONL, realignment of the Mangapū Stream tributary and the loss of 44.46ha of indigenous vegetation (most of which is in areas of SEAs), including 6ha located within the ONL.
115. Council's Landscape Architect is satisfied that the submitted Landscape and Visual Effects Assessment is thorough, based on an appropriate rationale and methodologies, and generally concurs with the conclusions reached by the Applicant with respect to magnitude and nature of effects, including potential cumulative effects.

0.335

116. He notes, however, that the long-term predicted levels of effect rely heavily on the successful and continued implementation of the suite of mitigation and management measures proposed as part of the application, and raises concern with the realistic delivery of these outcomes, particularly the Mangapū Stream Tributary realignment works. This is a complex scope of works, and reinstating the natural systems of the proposed realigned gulley will be a very challenging prospect. Success will require a relatively high input over a prolonged period and will require close ongoing monitoring. Thorough conditions will be required to ensure this is delivered in the manner proposed in the application documentation. 0.336
117. It is additionally noted that the zoning needs to be factored into the analysis of effects. The proposed activities are largely contained within the SPQZ, with a small (~6ha) area extending into the MRZ. The MRZ provides for quarrying activities as a discretionary activity, and such an activity can fit legibly into a working rural landscape, particularly given the backdrop of the SPQZ within which this sits. It is therefore accepted that a visual outcome of unnatural horizontal benches that would result from such a quarrying activity is likely anticipated by the statutory context of the site. 0.337
118. Minor changes to the recommended conditions of consent are recommended to ensure that the maintenance timeframes for all mitigation elements are strengthened given the risks identified with practical delivery of the outcomes proposed. It is understood from discussions to date with the Applicant that these recommendations have generally been agreed upon between the Applicant and Council. 0.338

Conclusions on Landscape and Visual Effects

119. Overall, there is a high level of agreement between the Council and the Applicant with respect to magnitude of Landscape and Visual Effects. These will be moderate-high (more than minor) in the long-term after mitigation, but, provided the mitigation proposals can be delivered as proposed, will not be significant in the context of the FTAA. 0.339
120. Provided the recommended conditions are imposed, there are no significant residual landscape and visual impacts that require proportionality assessment. 0.340

Parks Planning

Applicant's Assessment

121. There are no direct impacts on any existing parks, open space zoned land, or land administered by Parks and Community Facilities because of the quarry expansion itself. The proposal engages Parks' interests in two respects: the proposed biodiversity offsetting and compensation within the Hunua Ranges Regional Park, and a boundary adjustment which potentially triggers the esplanade reserve provisions of the Resource Management Act 1991 ('RMA').
122. No specific commentary has been provided by the applicant with respect to Parks Planning matters.

Council's Assessment

123. Council's Parks Planner is overall supportive of the proposed biodiversity offsetting and compensation outcomes that are proposed within the Hunua Ranges Regional Park. The Regional Parks Ranger advises that these projects would greatly benefit the regional park, enabling restoration of riparian, wetland and forest areas beyond the team's current capacity and funding. It is noted that formal third-party approvals will be required prior to these works being undertaken, but the in-principle approval submitted with the application provides sufficient certainty with respect to that formal process. 0.341
124. With respect to the potential esplanade reserve triggers, the concern of the lodged Scheme Plan has been detailed in Annexure 14. The applicant has provided an updated Scheme Plan, dated 24 July 2026, to resolve this issue. It is understood that, at the time of writing, this updated plan may not have yet been submitted to the Panel. To ensure there are no esplanade reserve issues, Council encourage the Panel to ensure this revised scheme plan is received and treated as the final scheme plan for the proposed boundary adjustment. 0.342
124. With respect to the potential esplanade reserve triggers, the concern of the lodged Scheme Plan has been detailed in Annexure 14. The applicant has provided an updated Scheme Plan, dated 24 July 2026, to resolve this issue. It is understood that, at the time of writing, this updated plan may not have yet been submitted to the Panel. To ensure there are no esplanade reserve issues, Council encourage the Panel to ensure this revised scheme plan is received and treated as the final scheme plan for the proposed boundary adjustment. 0.343

Conclusions on Parks Planning effects

125. Adverse Parks planning effects are not anticipated by the proposed development, subject to the revised scheme plan and implementation of proposed conditions of consent. 0.344
126. There are no significant residual Parks planning impacts that require proportionality assessment.

Archaeology

Applicant's Assessment

127. An Archaeological assessment has been completed by Clough & Associates in support of the application. This details that there are no recorded archaeological sites within the proposed quarry development area and no additional sites were recorded during field surveys. The likelihood of the accidental discovery of artefacts is generally considered to be low, however the presence of isolated archaeological sites around the Mangapū stream cannot be completely excluded.
128. No RMA consents are identified as being required with respect to archaeological controls. It is understood that, for completeness, the applicant has included an application for an Archaeological Authority pursuant to the Heritage New Zealand Pouhere Taonga Act.

Council's Assessment

129. Council's review with respect to archaeological matters has been restricted to RMA matters. 0.345

130. Council's Archaeologist (**Annexure 16**) concurs with the applicant's assessment that there are no affected scheduled historic heritage sites or unrecorded unscheduled archaeological or historic heritage sites that would be affected by the proposed development. The applicant has offered an Accidental Discovery Protocol condition of consent which is considered appropriate within this context to manage any potential adverse effects from accidental discovery during works.

0.346

131. Council's Archaeologist is supportive of the cautious archaeological authority approach taken by the Applicant, and the associated management of mitigation of potential effects associated with unrecorded sites via this authority process.

0.347

Conclusions on Archaeology effects

132. Adverse archaeology effects are not anticipated by the proposed development.

0.348

133. There are no significant residual archaeology impacts that require proportionality assessment.

Cultural Values

Applicant's Assessment

134. A detailed iwi engagement report has been prepared by Boffa Miskell that summarises the site and statutory context with respect to mana whenua and iwi interests, and all consultation undertaken with mana whenua by the applicant at the date of lodgement of the Substantive application. This also summarises the cultural values identified by mana whenua in relation to the project through that consultation process, and the project response to those values.

135. An assessment of cultural values has also been completed by Boffa Miskell in the submitted AEE (section B7.13).

136. The assessment concludes that the Project will be undertaken within an area with known cultural values, but that potential effects will be suitably managed through on-going partnerships with mana whenua that enable their on-going input into the development of the various management plans and final design details. The applicant has confirmed they are dedicated to on-going consultation and engagement with mana whenua.

137. It is understood that consultation has been on-going with mana whenua groups since lodgement of the substantive application. This includes:

- a. The preparation of an additional Landscape Memorandum addressing an identified cultural viewpoint of the site from Pukekoiwiriki pa in Red Hill (requested by Te Aakitai Waiohua). This was provided to Council on 16 June 2026. Council has not seen any response from Te Aakitai Waiohua to this additional information.
- b. Ngati Tamaoho have identified that they wish to prepare a Cultural Values Assessment. It is understood that this is being prepared post-lodgement,

however Council have not sighted this CVA at the time of writing this report.

138. Conditions of consent have been offered to require the on-going implementation of the Kaitiaki Forum that will enable on-going consultation with mana whenua throughout the progress of this consent, including for mana whenua input into the development of final management plans.

Council's Assessment

139. We are in broad agreement with Boffa Miskells' conclusions that input from mana whenua groups is fundamental in enabling an assessment of the effects on cultural values of an application to be completed. We also support the applicant's dedication to on-going engagement and consultation with interested mana whenua groups and to prepare a Cultural Management Plan, as well as to continue the implementation of the Kaitiaki Forum.

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0.350

140. The proposal incorporates activities that have the potential to generate significant adverse effects on cultural values, including (but not necessarily limited to) the riparian and SEA vegetation clearance, stream diversion and reclamation/loss, and groundwater takes and diversions. We would therefore encourage the consultation process to be completed with relevant mana whenua groups prior to a decision being made to ensure that an appropriately informed assessment of the scale of cultural value effects can be completed. In particular this would include the provision of the CVA being prepared by Ngati Tamaoho, and a response from Te Aakitai Waiohio in relation to the additional landscape assessment from Pukekoiwiriki pa.

0.351

141. However, the information provided to date from mana whenua groups is comprehensive and provides a good understanding of the cultural values as they relate to the site and scope of proposed works.

0.352

142. Based on the consultation and feedback received to date it is understood that no fundamental issues have been raised by Mana Whenua with the application in its current form. The consultation process to date has identified that there are known cultural values which have the potential to be adversely affected by the development. Therefore the works will require careful management to ensure those effects are suitably avoided and/or mitigated.

0.353

143. It is also noted that while the AEE and Iwi Engagement Summary report confirm a Cultural Management Plan will be prepared and is proposed to be conditioned, this has not been included in the recommended condition set. This appears to be an oversight and should be rectified in the final condition set.

0.354

Conclusions on Cultural Values Effects

144. The applicant has confirmed in good faith that they will continue engagement and consultation with mana whenua throughout works. Based on the consultation completed to date we are not aware of any major concerns from mana whenua with the proposed works. It is understood that consultation is on-going, which generally aligns with the formal feedback and requests received from mana whenua to date. It is, however,

recommended that final responses from Te Aakitai Waiohū and Ngāti Tamaoho be provided prior to making a determination on this application to ensure potential cultural value effects have been fully understood and addressed.

0.355

145. The proposal incorporates activities that have the potential to generate significant adverse effects on cultural values. Given the incomplete nature of consultation to date, a proportionality assessment is considered appropriate to be undertaken. See **Section D** below.

0.356

Water Supply Infrastructure

Applicant's Assessment

146. The applicant has considered potential effects of the proposed groundwater drawdown on the existing Watercare reservoir at Hunua (Hays Creek Dam) in the submitted Groundwater Effects Assessment. This is based on existing monitoring data, which confirms that the groundwater systems are likely separate with no interaction from the Hunua pit dewatering, and this is expected to continue with the proposed expansion.

Council's Assessment

147. Watercare Services Limited (Watercare) have reviewed the application in relation to any potential adverse effects on their water supply infrastructure, and in particular the Hays Creek Dam as a result of the proposed groundwater dewatering and diversions proposed as part of this application.
148. Based on the location of the Project, the supporting assessments and the proposed conditions, Watercare agrees that the dewatering associated with the Project is unlikely to have any effect on the Hays Creek Dam.
149. Minor changes to conditions are recommended.

0.357

Conclusions on Archaeology effects

150. Adverse effects on existing public water supply infrastructure are not anticipated by the proposed development.
151. There are no significant residual impacts that require proportionality assessment.

0.358

SECTION C.2 STATUTORY STRATEGIES AND POLICIES ASSESSMENT

Summary of key strategies and policies

152. The following is a summary of the key statutory strategies and policies that are relevant to the Hunua Quarry project:
- a. National Policy Statement: Freshwater Management (NPS: FW)

- b. National Environmental Standard: Freshwater (NES: FW)
- c. National Policy Statement: Indigenous Biodiversity (NPS: IB)
- d. National Policy Statement: Urban Development (NPS: UD)
- e. National Environmental Standard: Contaminated Soils (NES: CS)
- f. National Environmental Standard: Air Quality
- g. National Policy Statement: Infrastructure (NPS: I)
- h. Auckland Unitary Plan: Regional Policy Statement (AUP: RPS)
- i. Auckland Unitary Plan (AUP)¹
- j. Plan Change 120 (PC120)

153. The applicant has provided a detailed assessment of the application against these provisions in Section B9.2 of the submitted Assessment of Environmental Effects and the supporting Objectives and Policies Statutory Assessment document. We are in broad agreement with this assessment, and do not intend to repeat that assessment here. Rather, we have restricted our further comments and assessment in this section to areas where there are points of difference.
154. Of particular note, we confirm that we concur with the applicant's assessment of the application against the relevant Mixed Rural Zone provisions and have nothing further to add.

0.359

Transport

155. The relevant provisions that relate to transport matters are contained within Chapters B3 (Regional Policy Statement), E27 and E28 of the AUP. These provisions collectively seek to ensure that infrastructure is resilient, efficient and effective, and the potential adverse effects of development and use, in particular mineral extraction from land uses, avoid, remedy or mitigate as far as is practicable significant adverse effects on the transport network.
156. The applicant's assessment against these provisions concludes that the project aligns with the various provisions at B3, E27 and E28. They conclude that the existing roading infrastructure has sufficient capacity to accommodate the proposed increase in truck movements, and the project will result in a net positive gain for the safety of the existing transport network with the upgrade of the existing entrance to the site.
157. E27.2(1)(b) seeks to ensure that *"land use and all modes of transport are integrated in a manner that enables ... the adverse effects of traffic generation on the transport network to be managed."* While the traffic generation of this activity is within the permitted limits at E27.6.1, it does accommodate a significant increase to the existing heavy vehicle traffic generated by the quarry which has the potential to exacerbate existing safety issues on Hunua Road as discussed in Section C.1 above.
158. The relevant provisions of Chapter E28 similarly seek to ensure that mineral extraction activities avoid, remedy or mitigate significant adverse effects from that activity as far as

¹ All application documents refer to the Auckland Unitary Plan: Operative in Part. Since lodgement of the substantive application, all appeals on the Auckland Unitary Plan have been resolved, and it can now be treated as fully operative. It is no longer "Operative in Part."

is practicable (E28.2 (1), and E28.3 (4)). Policy E28.3 (5)(c)(i) specifically requires proposals for mineral extraction activities to demonstrate that adequate measures will be used to “*manage adverse effects of traffic generation and maintain safety for road users, particularly measures to manage heavy vehicles entering or exiting the site.*”

159. Overall, the AUP does require mineral extraction activities to carefully consider and manage their effects on the road network, and in particular those effects from increased heavy vehicle use.

160. As discussed above Auckland Transport have outstanding concerns with respect to the adverse safety effects of the proposed development on the surrounding roading network. The Applicant’s position is that this is out of scope of this application and is an existing effect that cannot be directly correlated to this proposal. At this stage insufficient information is available to reach a planning conclusion from Council’s perspective in this regard. We would welcome further planning and legal comment from the Applicant in this regard for further consideration.

0.360

161. As the relevant transport provisions of the AUP are directly related to adverse effects, should the Panel reach a conclusion that the adverse transport effects of concern are either not within scope of this application, or will be adequately mitigated by the offered Augier condition from the applicant for installation of rumble strip at this corner of concern, then the proposal could in turn be considered consistent with these provisions.

0.361

Ecology

162. As identified above, the proposal incorporates significant works that affect, and largely result in the loss of, a variety of existing ecological features. The proposal includes the reclamation of approximately 1.727km of streams within the site (with the diversion, a loss of 1.157km), removal of 44.46ha of native forest and 4.15ha of exotic vegetation; and the reclamation of 0.22ha of wetland features.

163. The statutory documents that are relevant to this matter include the NPS: FW, NES: FW, NPS: IB, AUP RPS and AUP.

164. The objective of the NPS: FW centres on ensuring that natural and physical resources are managed in a way that prioritises; first, the health and well-being of water bodies and freshwater ecosystems; second, the health needs of people (such as drinking water); and third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future. Of particular relevance is Policy 7, which states that “*the loss of river extent and values is [to be] avoided to the extent practicable.*”

165. The NES: FW gives effect to the NPS: FW. It sets out requirements for carrying out certain activities that pose risks to freshwater and freshwater ecosystems, and most relevantly seeks to protect urban and rural streams from in-filling and ensure connectivity of fish habitat (fish passage).

166. The objective of the NPS: IB is to maintain indigenous biodiversity across Aotearoa New

Zealand so there is at least no overall loss in indigenous biodiversity.

167. The key provisions Chapter B7 – Natural Resources collectively seek to enhance degraded freshwater systems, minimise the loss of freshwater systems, and avoid, remedy or mitigate the adverse effects of changes in land use. Policy B7.3.2 (4) states that permanent loss of streams should be avoided unless:
- a. it is necessary to provide for:
 - i. the health and safety of communities; or
 - ii. the enhancement and restoration of freshwater systems and values; or
 - iii. the sustainable use of land and resources to provide for growth and development; or
 - iv. infrastructure;
 - b. no practicable alternative exists;
 - c. mitigation measures are implemented to address the adverse effects arising from the loss in freshwater system functions and values; and
 - d. where adverse effects cannot be adequately mitigated, environmental benefits including on-site or off-site works are provided.
168. Chapter E3 of the AUP similarly seeks to avoid the reclamation and drainage of the bed of a stream, unless there is no practicable alternative (E3.2 (6), E3.3(13)(a)), and the activity avoids significant adverse effects and avoids, remedies or mitigates other adverse effects (E3.3(13)(c)).
169. The applicant has provided a detailed assessment of the functional requirement and consideration of practicable alternatives in sections B9.4.2, B9.5.2, and B9.5.3 of the submitted AEE. We generally concur with the applicant's assessment. The proposal accommodates quarrying activities within a Special Purpose – Quarry Zone, and as such the AUP anticipates and provides for this type and extent of activity across the project area. Quarry activities are inherently intrusive and require substantial landform modifications in order to operate. As such, we are comfortable there is no practicable alternative for the proposed reclamations, with the exception of the quarry not expanding beyond its existing consents (i.e.: if these applications are declined).
170. There are outstanding concerns with the adequacy of the offset and compensation package proposed, as discussed in more detail above. As such, there is a concern that the application will not be consistent with the various provisions of the NPS: FW, NES: FW, NPS: IB, AUP: RPS and AUP as all documents seek to overall ensure that, where stream loss cannot be avoided, indigenous biodiversity, freshwater system functions, and ecological values are maintained or adverse effects of activities are suitably mitigated or adequate off-site environmental benefits (offset and compensation) are provided.
171. If the Panel is satisfied this is achieved by the proposed mitigation, offset and compensation package then the application could be determined to be consistent with these statutory provisions.

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SECTION D: SUMMARY OF ASSESSMENT OUTCOMES AND PROPORTIONALITY CONCLUSIONS

Overview

172. This concluding section provides a brief joint overview of the outcome of the overall Council assessment of the application, based on an objective assessment of the application material as at 13 July 2026.

173. The section is structured as follows:

- **Section 85 adverse impacts / proportionality assessment:** Analysis under section 85(3) of the Fast Track Approvals Act, examining whether adverse impacts are sufficiently significant to be out of proportion to the project's regional or national benefits.
- **Key information gaps:** Identification of residual information deficiencies and their implications for decision-making by the Panel.
- **Key findings:** Again, as at the date of providing these comments (11 August 2026), with our joint recommendation to the Panel.

SECTION D.1: Section 85 adverse impacts / proportionality assessment

174. Under section 85(3) of the FTAA, the Panel **may** decline an approval where adverse impacts are sufficiently significant to be out of proportion to the project's regional or national benefits.

175. This assessment requires consideration of:

- The nature and significance of adverse impacts identified through the section 81(2) process;
- The project's regional or national benefits as assessed under section 81(4);
- Whether proposed conditions or Applicant modifications could adequately address adverse impacts;
- Whether the proportionality threshold is met even after accounting for mitigation measures, compensation etc.

176. For the avoidance of doubt, the Council's assessment has not identified any reasons why the application **must** be declined in terms of section 85(1) of the FTAA.

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Headline issues identified

177. Based on the detailed analysis in **Sections B and C** above, the following adverse

impacts have been identified, individually and collectively, as potentially meeting the section 85(3) threshold:

- **Issue 1: Potential Road Safety Effects** – The proposed development may exacerbate road safety risks and effects from the on-going and increased heavy vehicle trips along the narrow Hunua Road corridor that are unresolved and potentially significant. 0.367
- **Issue 2: Ecological Effects** – The proposal results in a significant loss of stream extent, vegetation clearance and wetland loss. There are unresolved questions with respect to the adequacy of the mitigation, offset and compensation package proposed, and as such there are potentially unresolved effects of concern in this regard. 0.368
- **Issue 3: Potential Cultural Values Effects** – The Applicant has not completed consultation with relevant iwi groups to confirm the potential scale of adverse cultural effects from the proposed development. There are therefore potentially unresolved effects of concern in this regard and for completeness a proportionality assessment is considered appropriate. 0.369

Project benefits summary

178. The Applicant contends that the project will deliver regionally significant benefits through the provision of aggregate to support urban development with associated economic benefits for the Auckland region.
179. The applicant also states that there will be ecological benefits from the proposed mitigation, offset and compensation package that will result in a net ecological gain overall, and that the proposed noise management measures will improve existing operational noise effects/protectations on some surrounding properties. The Applicant does not, however, contend that these benefits will be regionally significant.
180. The assessment of claimed regional benefits has been considered holistically across all adverse impact assessments and informs the tabular proportionality assessment below.
181. This assessment draws on:
 - The Applicant's Assessment of Environmental Effects and supporting technical reports, including the Applicant's economic assessment;
 - The Council's economics review by Mr Yeoman (**Annexure 10**) who has reviewed the Economic Impact Assessment, dated 17 June 2026.
182. In summary:
 - a. Mr Yeoman in his wider review of the Applicant's economic assessment has concluded the following:

- | | | |
|----|--|-------|
| a. | There are reservations with the methodology used for calculating demand for aggregates, however it is accepted that the demand for aggregates in Auckland is likely to continue to grow and additional sources of aggregates will need to be enabled to support growing demand. | 0.370 |
| b. | Avoided transport costs and emissions are benefits likely to arise from the proposed expansion. There are some minor issues with the Applicants assessment in this regard that may mean benefits have been over or under stated, but there is broad agreement that regardless these are likely to be regionally significant | 0.371 |
| c. | Economic benefits from on-site operation and construction will not be significant at a regional scale. This is agreed between Council and the Applicant. | 0.372 |
| d. | No costs are identified in the report, however there are foreseeable costs such as environmental effects that, if acknowledged and addressed in the cost-benefit analysis, would provide a more complete understanding of economic effects. Regardless, it is not anticipated that such costs would outweigh the economic benefits estimated. | 0.373 |
| e. | Economic Impact Analysis has significant limitations for assessing the Proposed Development and this part of the analysis should be treated with caution. The proposal would be more convincing if the costs and benefits of the proposal was presented in the form of a cost-benefit analysis. | 0.374 |
| b. | Mr Yeoman in his review concludes that <i>“the Hunua Quarry Expansion would likely generate regionally significant economic benefit (s22(1)(a) of FTAA). I also consider it likely that if the economic costs were fully quantified they would be smaller than the estimated benefits.”</i> | 0.375 |
| c. | The AEE states that the proposal will significantly contribute to the development of land and infrastructure for urban land uses by contributing to a reduction in costs (and associated barriers for development) for Auckland’s construction sector, due to reduced transport costs. We accept that the provision of local aggregate will contribute to the development of land and infrastructure for urban land uses in Auckland, and that this will likely be regionally significant. | 0.376 |

Assessment

183. A detailed assessment is provided below in tabular form.

Adverse impacts	Section 85 assessment
1. Road Safety	Significance Assessment: The proposal has the potential to generate adverse effects on the safety and efficiency of the surrounding roading network, particularly along Hunua Road where Auckland Transport have identified an existing safety risk that they consider will be exacerbated by the increase in truck movements this application will generate. If unresolved, these effects have the potential to be significant, given the risk of significant human injury/harm from any incidents, in terms of the safety and efficiency of primarily the local roading network on Hunua Road. Regional/National Benefits Considered: See Project Benefits Summary above. Proposed Conditions/Mitigation/Compensation: The outstanding concerns relating to traffic safety and network capacity and performance in the immediate vicinity of the site, if the Panel considers these to be within scope & exacerbated by this application, would be best resolved through the provision of additional information prior to a decision being made on this consent application. Conditions as recommended by Auckland Transport would not be appropriate as there are likely implementation issues with such conditions given consenting obligations and issues with practical delivery of the identified mitigation measures by Auckland Transport. The applicant has offered an Augier condition to install rumble strips at this corner, which Council agree would beneficially contribute to improving safety at this corner. Insufficient information is available to confirm if this in and of itself would be sufficient to appropriately mitigate the safety risk identified. Proportionality Conclusion: The identified area of concern is restricted to a single corner on the Hunua Road corridor, and as such is limited in extent. The applicant has also offered an Augier condition to install mitigation in the form of rumble strips at this corner, which Council agree will contribute to improving safety at this corner. Given this, it is considered unlikely that the adverse impact will be out of proportion to the benefits of the proposal, however the information available is insufficient to allow us to reach an informed conclusion at this stage, particularly given the risk involves a risk to human life.
2. Ecological Effects	Significance Assessment: The proposal results in significant ecological loss, through stream reclamation, diversions, terrestrial vegetation clearance and wetland reclamation. Mitigation, Offset and Compensation has been provided, however there are unresolved concerns with the adequacy of this package and the realistic delivery of the outcomes purported to be achievable, such that there is the potential for this to be insufficient to adequately achieve the expectations of the effects management hierarchy and statutory framework. There is therefore the potential for significant residual ecological effects. Regional/National Benefits Considered: See Project Benefits Summary above. Proposed Conditions/Mitigation/Compensation: A comprehensive mitigation, offset and compensation package has been proposed by the applicant to manage potential adverse effects on terrestrial and freshwater ecosystems. The proposed offsetting and compensation measures are, however, questioned with respect to the adequacy of the details and there are unresolved concerns that these may not adequately address the full extent of adverse effects in accordance with the effects management hierarchy and statutory framework. Further information is recommended to be requested to provide greater confidence with the proposed package. Proportionality Conclusion: The proposal has the potential to generate significant adverse residual ecological effects. Insufficient information is available to confirm the scale of these effects. Given this would amount to a gap in mitigation, offset and compensation

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		levels (not a full loss) the residual unaddressed effects are unlikely be to out of proportion with the benefits of the proposal, however, given the insufficiency of the information, we cannot reach a final conclusion at this stage.	
3. Cultural Values Effects		Significance Assessment: The proposal incorporates activities that have the potential to generate adverse effects on cultural values. The applicant has not completed consultation with interested iwi groups, noting in their application that this is on-going. Mana Whenua consultation plays a critical role in understanding the potential cultural values of a site/area, the effects a proposal may have, and how those effects could be mitigated or avoided. Without completion of the consultation, it is difficult to reach conclusions on the scale of potential effects on cultural values. Based on the information available to date, it appears unlikely that cultural values effects of the proposal will be significant, however completion of the consultation process is necessary to confirm this conclusion. Regional/National Benefits Considered: See Project Benefits Summary above. Proposed Conditions/Mitigation/Compensation: There is inadequate information to allow an assessment of effects or determination of necessary management/mitigation measures to be undertaken. As such, at this stage a conclusion cannot be reached on whether the proposed mitigation measures and conditions of consent would adequately mitigate such effects, or whether additional conditions could appropriately manage these effects. However we acknowledge the positive approach the applicant has offered with respect to conditions of consent. The offered conditions will ensure on-going consultation is undertaken with mana whenua post-approval, with respect to development of management plans, and throughout works, which will allow for on-going input into procedures to manage such effects. Proportionality Conclusion: The proposal has the potential to generate significant adverse cultural values effects. Insufficient information is available to confirm the scale of these effects. These are considered unlikely individually be to out of proportion with the benefits of the proposal, however, given the insufficiency of the information, we cannot reach a final conclusion at this stage.	0.384 0.385 0.386 0.387

Conclusion

184. Having noted the above matters, we consider it unlikely that there will be a proportionality concern with the application, however there is currently insufficient information to reach a suitably informed conclusion in this regard. 0.388
185. The potential effects of concern likely could be adequately avoided or mitigated subject to the further information being requested and provided to substantiate the Applicant's assessment. If these matters can be adequately resolved through the provision of the identified additional information, then we do not foresee there being a proportionality concern in this regard. 0.389

SECTION D.2: Key information gaps

186. The following table identifies residual information gaps that remain having reviewed the current application material provided as referred to throughout this report and explains their significance for decision-making. Council considers that this information is necessary prior to determination, and the Panel is invited to request these from the Applicant:

Information gap	Nature of deficiency	Decision-making impact	Risk / uncertainty created	
Updated Offset calculations	There are concerns with the adequacy of the prepared offset and compensation calculations. The offset calculations, being the BOAM and SEV-ECR are required to be updated with improved assessment attributes and receiving site values in BOAM and receiving site metrics for the SEV-ECR calculations to demonstrate no net loss and net gain.	The "net gain in net present biodiversity value" conclusion is untestable without the model. This is the key component of the claim in the whole vegetation and stream offset and is not easily addressed by a condition. The inadequacies identified have the potential to alter the scale and scope of offset and compensation required to appropriately address the residual ecological effects of the proposal, which has the potential to be significant. This may require the identification of additional offset or compensation sites in order to deliver the anticipated outcomes.	There is a risk the proposal may result in significant adverse ecological effects that are not adequately mitigated, offset or compensated for, or result in implementation issues for the consent.	0.390
Consultation with Mana Whenua	The applicant has not completed the consultation process with Mana Whenua groups that have identified interest in this application. Completion of the consultation process, and provision of all prepared CVAs/CIAs/Kaitiaki Reports and/or other responses received by Iwi is required.	The proposal accommodates activities that have the potential to generate significant adverse effects on cultural values. A conclusion cannot be reached on the scale of these effects without the necessary input from the relevant iwi/mana whenua groups.	There is a risk the proposal may result in significant adverse cultural values effects that are not adequately mitigated or result in implementation issues for the consent.	0.391
Updated road safety and intervisibility assessment	Auckland Transport have identified a road safety concern with the application, that they do not consider has been adequately addressed by the application. They have identified a condition of consent to address the concern, however given the consenting and implementation implications, this is not considered appropriate to condition. To allow for a complete understanding of the potential safety risks of the proposal an updated road safety and intervisibility assessment is required to understand the risks at the corner in question from the increased truck movements to/from the site along Hunua Road.	If the Panel concurs that the exacerbation of this existing safety concern is a likely effect of the proposal, then this has the potential to result in increased risk of serious harm to human life (noting there were two serious injury crashes at this location), an effect which may not have been adequately considered or mitigated by the proposal in its current form.	There is a risk the proposal may result in adverse road safety effects that are not adequately mitigated.	0.392
Culvert Performance Assessment	There are concerns with the culvert designs and assessment provided with respect to their performance	If there is risk of the embankment overtopping during such scenarios then there is the	There is a risk the proposal may result in adverse flooding effects that are not	0.393

	during blockage scenarios and associated risk of overtopping the embankments causing downstream flooding effects that have not been considered or assessed in the application package. To allow for a complete understanding of this potential effect, an assessment of the Eastern culvert flood performance, including confirmation of upstream flood level effects during events greater than the 2% AEP, with consideration of partial and full blockage scenarios and available freeboard to the haul road crest is required.	potential for adverse downstream flooding effects that have not been identified or assessed in the application package. There is a risk that these could be potentially significant.	adequately mitigated. This could be managed via additional conditions of consent (as recommended in Section D.3 below), however it is recommended that this information be provided up front to avoid any potential risk of implementation issues should the required design solution that would be included in a condition of consent can't be achieved through detailed design.
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SECTION D.3: Conditions

187. Discussions are on-going with the Applicant in relation to conditions of consent, however we provide the following as a compiled summary of Council's unresolved comments on conditions based on the numbering of conditions in the version dated 14 July 2026.

188. In providing these comments it is noted that:

- a. Due to tight timeframes Council has not had a chance to review the SMART review edits undertaken by the Panel or the further feedback on that review from the applicant. We would be happy to provide any comment in that regard if required by the Panel as part of on-going conditions review and discussion; 0.394
- b. The below does not include the recommended condition of consent from Auckland Transport that has not been agreed between Council and the Applicant given the planning comments in Section C.1 of this report that it would be an inappropriate condition to include; 0.395
- c. Where any comments from specialists in the supporting Annexures has been accommodated into the latest version of conditions and/or variations have been agreed to, these have similarly not been included below.

Condition	Council Comment	
General	Condition numbering and cross-referencing will need a careful once-over once conditions have been finalised to ensure all cross references are accurate and referring to the correct condition. Various references to correcting cross-referencing throughout specialist memos that support this response have not been detailed in this table.	0.396
	The wording of all conditions should ensure the following: 1. "must" is used instead of "shall" 2. All references to the Council is detailed as "The Council," not "Team Leader"	0.397

	XXXX"/"Monitoring"/etc.	
	<u>Water Quality Monitoring</u> There are numerous water quality monitoring conditions (39, 44, 45, 116, 117, 179, 200). They appear to be related to the stream diversion, ESCP and augmentation water. The stream diversion monitoring is proposed to cease/stop on completion of the physical works. The ongoing water quality monitoring is therefore limited to the ESCP, WQMMP, Flow Augmentation Monitoring. Continuous monitoring is accomplished well in many large projects and it is uncertain why the applicant does not wish to implement it on this site. Continuous monitoring provides detail of attribute values over time, more so than a single point assessment. In addition, if telemetry is used, then alarms can be set enabling rapid responses to environmental impacts. It is the Council Ecologist's recommendation that water quality monitoring should, where possible, be through the use of continuous monitoring equipment.	0.398
Part A	Add abbreviation to this table as follows: - CMP – Cultural Management Plan	0.399
Condition 24	Advice Note addition recommended: <i>Any management plans prepared under these conditions that relate to works within the Hunua Ranges Regional Park should be one and the same as, or consistent with, the management plans required by Auckland Council (Parks and Community Facilities) in its capacity as landowner. Early and ongoing engagement with the Regional Parks team on the adequacy of those plans is recommended. Note that one set of management plans does not override the other, and the consent holder will be responsible for ensuring that they remain compliant with their conditions of the resource consent as well as any requirements of Parks and Community Facilities.</i>	0.400
Condition 25	Add reference to Cultural Management Plan into Table 1	0.401
Condition 46	Council's ecologist requests that baseline monitoring be included (we accept that this could reference existing baseline information where available) as reference as well as inclusion of Dissolved oxygen and temperature. The applicant is not supportive of these additions indicating that these are in the SRMP, however, the SRMP only applies to construction-phase monitoring and therefore this will be the remaining water quality monitoring outside of ESCP and augmentation. It is understood that this condition for water quality monitoring is only for sediment monitoring (although the ESCP has its own monitoring). Long-term monitoring should be implemented (through this condition or another), that is comprehensive monitoring of water quality within the areas of potential impact of the quarry. Monitoring, where possible should be in situ and with continuous logging systems, preferably IOT or telemetry functions.	0.402
Condition 55	Council have concerns with the 5-year maintenance period and suggest amendments to 55 (i) to align with the maintenance requirements of Condition 129 (further comments on this below)	0.403
Condition 57	Council have concerns with the 5-year maintenance period for a project of this scale and delivery risk. We suggest amendments to 57 (i) as follows: ... (i) <i>a description of how maintenance of planting areas, including replacement of plants that do not survive, will be undertaken and which as a minimum requires maintenance to continue:</i>	0.404

	(i) for at least five (5) years, or and until 80% canopy closure is achieved (whichever occurs first); and (ii) until a plant survival rate of at least 90% of the original planting density has been achieved; ...
Condition 64	The 14/07/26 version of this condition does not include discussed amendments with the applicant to strengthen this condition with respect to providing greater certainty in delivering the outcomes purported by the realignment. These include the addition of an extra bullet point that states “achieves no net loss of value”, as follows: <i>The objective of the Stream Realignment Management Plan (SRMP) is to ...:</i> a) as far as practicable, ... b) <u>achieves no net loss of value; and</u> c) ... We understand the above amendment has been agreed to by the Applicant. Council's Ecologist however recommends the following further amendment to this point to further strengthen this condition in its ability to ensure delivery of the outcomes purported, given the inherent challenges with this piece of work, as detailed elsewhere in this response and supporting Annexures: b) <u>achieves no net loss of value or potential compared to the impacted reach and the maintenance of value is demonstrated using the Stream Ecological Value (SEV) assessment or equivalent. The impact stream has an SEV of 0.91 and 0.83 and the diversion target is thus >0.83; and</u>
Condition 65	<u>Flooding</u> To ensure the stream realignment works appropriately consider and manage potential adverse flooding effects associated with these works, it is recommended that the following amendments to condition 65 are included. <i>The SRMP must include the following</i> ... (e) <u>methods for diverting upstream flows during the streamworks, including how upstream ponding and/or other adverse flooding effects up and downstream will be managed and avoided during works and how sufficient ...</u> <u>Ecology</u> The 14/07/26 version of this condition does not include discussed amendments with the applicant to strengthen this condition with respect to providing greater certainty in delivering the outcomes purported by the realignment. These include the following amendments: (i) <i>planting plan showing riparian planting and revegetation of quarried benches above, including:</i> i. <i>description of the source, species mix, size, spacing, density, and layout, of plants and planting methods to be used;</i> ii. <i>timeframes for implementation;</i> iii. <i>description of how maintenance of planting areas, including replacement of plants that do not survive, will be undertaken, to achieve compliance with the requirements of conditions 124 and 125 – 127.</i>

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	(ii) <i>description of stream monitoring, including:</i> (iii) <u>existing baseline monitoring; and</u> (iv) <u>turbidity and sediment deposition monitoring;</u> (v) <u>water quality monitoring (including DO, temperature);</u> (vi) <u>ecological monitoring;</u> (vii) <u>frequency of monitoring;</u> (viii) <i>timeframes and measures of success;</i> (ix) <u>management actions to address any success measures not being met;</u> We understand the above amendment has been agreed to by the Applicant. Council's ecologist recommends the following further addition to ensure the relevant success targets are detailed in the condition. The applicant has identified success measures lower than that of the impact stream, which does not align with their ecological assessment which states there will be no net loss from the realignment. (viii) <i>Timeframes and measures of success, <u>noting the following must target measures of success: MCI ≥ Band B (NPS:FM attribute tables); Habitat Quality Score band ≥ Good; Deposited fine sediments (NOF Table 16) ≥ Band B</u></i>	0.408
New Conditions (Conditions 65A and B)	Add Cultural Management Plan conditions. Suggest Applicant provide recommended wording given it has been detailed in other application documents as offered by the applicant.	0.409
New Condition (Condition 66A)	Recommend additional condition as follows: <i>Within 12 months of completion of the diversion channel, the Consent Holder must undertake hydrodynamic modelling based on the as-built survey of the completed channel and provide a verification report to Auckland Council. The purpose of the report must be to confirm that the completed channel performs generally in accordance with the flood modelling undertaken under Condition 65 and that no material increase in downstream flooding effects has occurred as a result of the final constructed channel.</i> This would then enable verification that the outcomes required by Condition 65 are indeed delivered, recognising the identified challenging nature of these works.	0.410
New Condition (Condition 66B)	Recommend additional condition that requires the applicant to provide to Council for certification finalised culvert and haul road designs that include suitable supporting information on the eastern culvert flood performance, including confirmation of upstream flood level effects during events great than the 2% AEP, with consideration of partial and full blockage scenarios and available freeboard to the haul road crest. This must demonstrate that in such situations there is no risk of embankment overtopping. This would cover the concerns identified in Section C.1 and D.2 of this report with respect to insufficient information and potential unresolved flooding effects of this aspect of the design.	0.411
Condition 83	Add advice note: <i>Construction work includes (without limitation) temporary activities associated with vegetation clearance, stream realignment, rehabilitation work, and the construction of sediment retention ponds, haul roads, drainage networks, culverts, and earth bunds.</i>	0.412

Condition 118	Council's Ecologist is of the opinion that real-time monitoring via automated and continuous monitoring means should be included as a requirement in this condition. It is understood the Applicant is not supportive of this inclusion and that the condition is drafted in accordance with standard practice. This is an outstanding area of disagreement for the Panels' consideration. At a minimum, Council recommend an amendment as follows to ensure that a timeframe is given for action, as the conditions as currently drafted do not require this and could enable significant delays in response. <i>All water samples must be analysed for total suspended solids (TSS) and nephelometric turbidity units (NTU), within one week of collection. <u>Any responses required by Conditions 119-120 below must be implemented within 2 weeks from sampling (i.e.: 1 week from completion of sampling analysis).</u></i>	0.413
Condition 126	Suggested re-wording to address Council's outstanding concerns with the 5-year maintenance period & reflect understood intention for this condition from discussions with the applicant. <i>All planting required by Conditions 123-126 must be maintained for at least <u>a minimum of five (5) years after planting is completed or until it is demonstrated that the revegetated areas have been established to a point where 90% canopy cover is achieved, planting density meets or exceeds those specified in the SRMP, there are no fruiting or flowering weed species present and long-term health and sustainability is ensured without the requirement for intensive management, whichever is the latest.</u> Maintenance must include replacement of dead, dying, or diseased plants until canopy closure is achieved; and any additional works required to ensure successful establishment and ongoing sustained vegetation growth.</i> The suggested wording for this condition is understood to be generally agreed between the Applicant and Council.	0.414
Condition 129	Suggested re-wording to address Council's outstanding concerns with the 5-year maintenance period & reflect understood intention for this condition from discussions with the applicant. <i>All planting required by Conditions 115-116 must be maintained for a minimum of five (5) years after planting is completed <u>or until it is demonstrated that the revegetated areas have been established to a point where 80% canopy cover is achieved, planting density meets or exceeds those specified in the Detailed Design and Landscaping Plan (required by Condition 126), there are no fruiting or flowering weed species present and long-term health and sustainability is ensured without the requirement for intensive management, whichever is the latest.</u> Maintenance must include replacement of dead, dying, or diseased plants until canopy closure is achieved; and any additional works required to ensure successful establishment and ongoing sustained vegetation growth.</i> The suggested wording for this condition is understood to be generally agreed between the Applicant and Council.	0.415
Condition 131 and 132	Suggest that these conditions form part of condition 130 as it is intrinsically related to the understanding of condition 130.	0.416
Condition 140	Council recommend updates to this table to: a) set out the target ecological values to be achieved for each freshwater and terrestrial offset and measuring methods	0.417

	b) include clarity of staging/timing of delivery of each offset Advice Note addition recommended: <i>Any management plans prepared under these conditions that relate to works within the Hunua Ranges Regional Park should be one and the same as, or consistent with, the management plans required by Auckland Council (Parks and Community Facilities) in its capacity as landowner. Early and ongoing engagement with the Regional Parks team on the adequacy of those plans is recommended. Note that one set of management plans does not override the other, and the consent holder will be responsible for ensuring that they remain compliant with their conditions of the resource consent as well as any requirements of Parks and Community Facilities.</i>	0.418
Condition 141	Advice Note addition recommended: <i>No ongoing legal protection is identified in Table 2 for the offset and compensation sites within the Hunua Ranges Regional Park, as the park is already legally protected in its status as a regional park. For clarity, Auckland Council will not accept covenants or other legal instruments being registered on the records of title for its regional park land.</i>	0.419
New Condition (Condition 173A)	Recommended addition as Condition 173A <i>The daily abstraction from the Symonds Stream augmentation bore (HUN 14/8 or any replacement) must not exceed 1,400m³.</i>	0.420
New Condition (Condition 174A)	Recommended addition as Condition 174A <i>In the event that groundwater drawdown is such that any of the deep monitoring bores operated by the Consent Holder equal or exceed any trigger values in Schedule A then the Consent Holder must cease any further water level drawdown at the Symonds Hill Pit and within seven (7) days notify the Council in writing and by telephone of the exceedance of trigger levels. The notification must specify which bore trigger(s) have been exceeded, and the quantum of the exceedance for each bore. The Consent Holder must not recommence drawdown unless it is demonstrated that the trigger levels can be complied with to the written satisfaction of the Council.</i> <i>Advice note: The drawdown trigger levels in Schedule A define a consented "Envelope of Effects". If the Consent Holder is unable to comply with Schedule A triggers, then an application will be required for a change to consent conditions to seek a greater assessed envelope of effects.</i>	0.421
Condition 177	Should refer to the three successive steps of dewatering, not two. It is understood this change is agreed between Council and the Applicant.	0.422
Condition 184	Recommend this be updated to read: <i>Monthly monitoring of bores ID 1218 and 20013 must recommence in the event that groundwater drawdown is detected in bore HUN12/4U or HUN12/4L, and monthly monitoring of bores ID 421 and 21817 21817 must recommence in the event that groundwater drawdown is detected in bores ID421, HUN12/8U or HUN12/8L. Monitoring in these private bores is subject to access being available otherwise requirements under condition 180 apply.</i>	0.423
Condition 187	Recommend this be updated to read: <i>The Consent Holder must:</i> <i>(a) measure and record water levels in the bores listed in Schedule A (or use best endeavours with respect to the private bores 830, 20013, 20479, and 21474 (Glasgow bore)) at monthly intervals</i> <i>(b) measure and record water levels in bore ID421 (or use best endeavours) at quarterly intervals from the date of commencement of this consent.</i>	0.424

	(c) measure and record the water level from the top of the casing to the nearest 0.01 of a metre (i.e. the nearest centimetre). The bores operated by the Consent Holder must not have been pumped for at least 24 hours prior to the water level measurement being taken; and (d) keep records of each date and corresponding water level for each bore.	
Condition 196	This condition refers to Hays Stream and Symonds Stream - This should be referred to as Waipokapu Stream and Mangapu Stream respectively	0.425
Condition 202	The value of 6 mg/l for dissolved oxygen is considered to be low for this watercourse. The impact stream would have a value likely exceeding 9mg/l and the applicant's choice of 6 mg/l is that it is survivable for freshwater fish. I consider augmentation water of this low DO value would impact the freshwater values of the stream. Recommended measure is to increase dissolved oxygen > 8mg per litre in part b of the condition.	0.426
Condition 210	This condition refers to Hays, Symonds and Waihoihoi Streams - This should be referred to as Waipokapu Stream, Mangapu Stream and Waihoihoi Stream respectively.	0.427
Conditions 211-214	Conditions refer to Symonds Stream when it should be Mangapu stream for consistency across conditions.	0.428
Condition 214	Request amendments as follows: <i>If Watercare Services Limited (WSL) notifies the Consent Holder and the Council that either WSL's or the Consent Holder's monitoring indicates that the drawdown authorised by this consent is having a potential adverse effect on the dam structure, the yield from the reservoir, or the stream flows, the Consent Holder must, within one month, commission an independent expert mutually agreed with WSL to review the relevant monitoring data, and, if the expert considers it necessary, procure further data, to enable a report to be prepared by the expert forthwith. The report is to state whether or not the potential adverse effects at WSL's facilities or the variations in WSL's or the Consent Holder's monitoring information are a result of the dewatering authorised by this consent. If the report states that the dewatering is:</i> <i>not causing the adverse effect or not causing the variation in monitoring information, no further action will be required of the Consent Holder; or</i> <i>likely to be causing the adverse effect or causing the variation in monitoring information, the Consent Holder must, in consultation with the Council and WSL, identify options for avoiding, remedying or mitigating the potential adverse effects, and implement the method that represents the best practicable option for doing so, <u>with all costs associated with the investigation, assessment, monitoring, mitigation and implementation of any required measures to be met by the Consent Holder.</u></i> <u>The Consent Holder must provide WSL with copies of monitoring reports prepared at the same time as they are submitted to Auckland Council.</u>	0.429
Condition 219	Recommend this be updated to read: <i>In the event that groundwater drawdown is such that <u>in either or both</u> monitoring bores HUN12/8U on Hunua Road <u>or ID421 on Jack Paterson Drive</u> equals or exceeds the trigger value in Schedule A then:</i> <i>The Consent Holder must cease any further drawdown at the Symonds Hill Pit and within seven (7) days must notify the Council in writing and by telephone of the exceedance of trigger levels. Drawdown must not recommence without the Council's written approval;</i> <i>...</i>	0.430
Schedule A	Suggested details for missing figures in Schedule A as follows:	

	20013	1776109/ 5898810	39.83	-26.2 - -147.9	25.62	Greywacke	121.7	<u>23.4</u> <i>Provisional</i>	0.431
	1218	1775614 5898253	51.0	-7.8 - -51.0	27.0	Greywacke	<u>43.2</u>	<u>24.6</u> <i>Provisional</i>	
	421	1775479 5892910	31.59	-4.4 - -28.4	13.85	Volcanic	<u>24.0</u>	<u>10.6</u> <i>Provisional</i>	
	21817	1775198 5892910	28.5	-10.5 - -32.0	13.71	Volcanic	<u>21.5</u>	<u>10.5</u> <i>Provisional</i>	
	20478	1776578 /	127.11	44.2 - 87	42.82	Greywacke	24.6	9	
	Suggested additional advice note: <i>Advice Note Schedule A</i> Prior to finalising the trigger levels for bores ID421, 1218, 20013, and 21817 in Schedule A, the Consent Holder shall undertake a minimum of two baseline water level measurements in each bore - one during dry season conditions (January - April) and one during wet season conditions (July - October) — to establish current baseline levels. Trigger levels shall then be set based on these measurements plus an allowance for seasonal variation.								0.432
Condition 221	This condition should include specific reference to the approved subdivision plan. Amendments as followed are recommended (note, this references the revised subdivision plan received by Council on 27/07/26): <i>The Consent Holder must submit to the Council for approval under section 223 of the RMA, a survey plan of the approved subdivision. The survey plan must <u>be generally in accordance with the Scheme Plan entitled “Proposed Boundary Adjustment between Lot 6 DP 152736 & Lot 2 DP 115598 – Proposed Site Layout” rev 3, prepared by CKL and dated 24/07/26 and</u> show all easements and any amalgamation conditions, and be in accordance with the approved subdivision plan, and include the following:</i> ...								0.433
Condition 218	<i>Note: This condition is incorrectly numbered and should be Condition 222.</i> This condition can be deleted, subject to the amended Scheme Plan referenced in the recommended amendments to Condition 221 being the final approved version.								0.434

SECTION D.4: Key Findings

189. A number of adverse impacts have been identified in the Council's reporting which either can be addressed adequately through conditions of consent, or which do not outweigh the project's benefits. 0.435
190. However, the Council's assessment has identified the following residual adverse impacts that, collectively, may meet the section 85(3) threshold (i.e. where the adverse impacts could be significantly out of proportion to the regional benefits, even after taking into account mitigation etc): 0.436
1. **Potential Road Safety Effects** – There is a risk that the proposed increase in truck movements to/from the quarry will exacerbate an existing safety issue along Hunua Road that has resulted in two serious injury crashes in the past 5 years. We acknowledge that the crashes were the result of a car, and not a truck, crossing the centre line in each event, and the applicant's position that this is not an effect that can be directly correlated to the proposal. Given the scale of the safety risk (serious 0.437

injury crashes) it is considered that insufficient information is available to reach a conclusion in this regard.

2. **Potential Ecological Effects** - There is a key information gap in the application resulting in adverse ecological effects not being fully assessed; and whether the measures proposed by the Applicant are appropriate to mitigate, offset and compensate for these effects.

0.438

3. **Potential Cultural Values Effects** - There is a key information gap in the application resulting in adverse cultural values effects not being fully assessed; and whether the proposed measures proposed by the Applicant are appropriate to mitigate these effects.

0.439

191. While there is a potential for there to be significant adverse road safety, ecological and cultural values effects from the proposal, it is considered unlikely that individually these would be out of proportion to the regional benefits, even if overstated, given the statutory context of the site. The insufficiencies identified in the information mean that a conclusive finding in this regard cannot be made at this stage with respect to combined effects, however Council consider the likelihood of these effects collectively being out of proportion with the regional benefits is low.

0.440

Section 85(4) consideration

192. Our assessment has considered that the identified potential adverse impacts, if left unresolved, cannot be found to meet the section 85(3)(b) threshold solely because they are inconsistent with provisions of specified Acts or other documents. The proportionality assessment is based on the substantive significance of impacts relative to benefits, not (for instance) mere policy inconsistency.

0.441

Relevance of information gaps to assessment

193. The identified information gaps (detailed above) create a level of uncertainty in the assessment.
194. Collectively the adverse impacts identified above are very unlikely to meet the section 85(3) threshold, should the information gaps identified be addressed and adequate information provided in response. However, in our view it is essential that the information gaps are plugged in order for the Panel to reach a definitive conclusion with respect to the proposed application.

0.442

Recommendation and Conclusion

195. Based on our assessment we cannot reach a recommendation on the Application at this stage on the grounds that we have insufficient information to reach a final position. We can, however, foresee being supportive of the application with provision of this information, and subject to additional and amended conditions.

0.443

196. The Application has, in theory, the potential to generate significant adverse impacts as

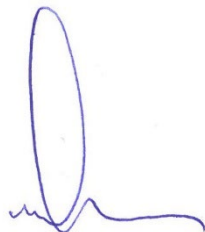
identified above, particularly in respect to ecological effects, road safety effects, and effects on cultural values. The identified information gaps are such that we are unable to reach a definitive conclusion on whether this would be the case. Should these information gaps be adequately addressed, however, we do not consider it likely that these will be individually or collectively out of proportion with the significant regional benefits.	0.444
197. Our assessment has been made in accordance with the FTAA. In particular, the assessment has had regard to all matters identified through the section 81(2) process and has been guided by the statutory purpose of the FTAA to facilitate infrastructure and development projects with significant regional or national benefits. While that purpose directs decision-makers to place greatest weight on enabling such projects, it does not override the requirement to assess whether adverse impacts are sufficiently significant to outweigh those benefits.	0.445
198. We consider our position at this stage to be consistent with the purpose of the FTAA, which is to enable significantly beneficial projects, not those where adverse impacts are so significant as to outweigh the benefits.	0.446
199. We have also given consideration to the purpose and principles in sections 5 to 7 of Part 2 of the RMA. In doing so, we have taken into account that the RMA's purpose is afforded lesser weight than the FTAA's purpose (in section 3, FTAA).	
200. It is our assessment that the proposal has not yet demonstrated that it can meet the purpose of the RMA which is to promote the management of natural and physical resources. The proposal has not yet demonstrated that it will avoid or mitigate adverse effects resulting from the quarrying activities on the environment to a sufficient extent, however subject to further information, it is likely the Applicant will be able to demonstrate that it does achieve the purpose of the RMA.	0.447
201. The proposal does result in the loss of areas of significant indigenous vegetation and habitats, and there are unresolved questions with respect to the proposed mitigation, offset and compensation package such that we cannot confirm that the proposal will adequately ensure there is no net loss of ecological values. As such there is a risk that the proposal would raise questions with respect to its consistency with Section 6. If the Panel is satisfied that the proposal does adequately ensure no net loss of ecological values, then the proposal would not be contrary to Section 6.	0.448
202. In relation to section 7 of the RMA: a. The proposal achieves the efficient use and development of natural and physical resources (section 7(b)), enabling the existing aggregate resource to be accessed and used for development elsewhere across the Auckland region; b. The proposal could maintain and enhance amenity values (section 7(c)) within the context of the Special Purpose – Quarry and Mixed Rural zoning of the site, subject to resolving final condition wording relating to landscaping and overlapping ecological mitigation matters;	0.449 0.450

- c. The proposal does result in the loss of the quality of the environment (section 7(f)) within the boundaries of the subject site, however the Applicant has demonstrated that this loss is unavoidable. The application encompasses mitigation, offsetting and compensation measures that will replace that loss on site as far as is practicable and result in the enhancement of existing environmental qualities at the offset sites. However there remains unresolved questions relating to the adequacy of this package to ensure there is no net loss of ecological value from the proposed works; 0.451
- d. The proposal will likely contribute to the management of climate change through improving local accessibility to aggregates and the associated reduction in transport emissions. The degree of this benefit is unclear. 0.452
203. Overall, the application is considered to have the potential to meet the relevant provisions of Part 2 of the RMA and achieve the purpose of the RMA, being sustainable management of natural and physical resources. However, this has not yet been definitively demonstrated by the Applicant due to insufficiencies in the information provided (and reviewed) to date. While we acknowledge that Part 2 of the RMA is afforded lesser weight than the FTAA's purpose, the potential issues in respect of consistency of the proposal with the RMA's purpose and a number of important principles that arise through insufficiencies in the information, reinforces our assessment of the importance of the outstanding information identified. 0.453
0.454

DATED the 11th day of August 2026



Planner
Emma Chandler
Planning Consultant for Auckland Council



Reviewer
Warwick Pascoe
Principal Project Lead, Auckland Council

Technical Specialist Memo – Contaminated land

To:

Emma Chandler – Lead Planner & Warwick Pascoe – Principal Project Lead

From:

John Newsome and Maria Baring

Qualifications & Relevant Experience:

John Newsome

- My name is John Newsome, and I currently hold one of the two Team Leader – Regulatory Engineering (South) positions with Auckland Council.
- I hold a bachelor's degree in Earth Sciences from Waikato University.
- I have 10 years' experience with a geotechnical engineering consultancy during the 1980s before joining Council in January 1991 as a development engineer.
- I have nearly 35 years of professional experience in Resource Consents processing and other engineering aspects of land development with Manukau City Council and then Auckland Council and am familiar with a wide range of projects over this period. I have maintained my interest in geotechnical aspects of Auckland soil and provide advice to staff on projects as required.

Maria Baring

- My name is Maria Baring, and I currently hold the position of Project Manager at Auckland Council.
- I hold a bachelor's degree in civil engineering from the University of San Carlos in the Philippines. I am a member of Engineering New Zealand [1010183].
- I am a project manager for premium applications at Regulatory Engineering South and have held this position for approximately three years. I was a senior development engineer prior and held the position for five years and a development engineer for eleven years.
- I have approximately 19 years of professional experience in Resource Consents processing. In this position I have processed the following applications of a similar nature:
- The major upgrade, including enabling works of State Highway 20A and associated local roads.
- Earthworks and stormwater controls associated with the enabling works for the Manukau Rail at Hayman Park, Manukau City
- Auckland Transport for Eastern Busway Stages EB2, EB3R, EB3C, and EB4L Link Road

Preparation in Accordance with the Code of Conduct:	Hindu Temple at 378 Ararimu Road, Drury
	We confirm that we have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (Code) and have complied with it in the preparation of this memorandum. We also agree to follow the Code when participating in any subsequent processes such as expert conferencing directed by the Panel. We confirm that the opinions we have expressed are within our area of expertise and are our own, except where we have stated that we are relying on the work or evidence of others, which we have specified.
Date:	27 July 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Hunua Quarry
Fast-Track application number:	FTAA-2603-1185 (Council Reference BUN60464053)
Site address:	489 Hunua Road, Hunua

2.0 Executive Summary / Principal Issues

Geotechnical assessment review – John Newsome

The applicant's geotechnical assessment report gives me confidence that the author has a great understanding of the geology of the site, the characteristics and behaviour of materials in the quarry, and the effect of the proposed staged expansion works. In this regard I cannot see any issues or concerns from a geotechnical perspective should approval be given.

Other development engineering aspects – Maria Baring

The other main development engineering element of the proposal pertains to overland flow paths and

0.021

flooding. The provisions at H28.4 Special Purpose – Quarry Zone: H28.7.1 Matters of control (2) (b) (where outside the quarry pit), and E36 are considered relevant in this regard.

The application indicates that Stage 1 works will obstruct an existing watercourse, as the proposed earthworks are located within the watercourse corridor. The proposed earthworks and diversion of the watercourse have the potential to adversely affect flow conveyance and may increase the volume, extent, or frequency of flooding on surrounding properties.

0.022

The Flood Risk Assessment prepared by PDP (memorandum dated 30 March 2026) does not specifically consider the proposed Stage 1 diversion of the watercourse. However, PDP's subsequent update, 18 June 2026, requires detailed flood modelling to be undertaken during the detailed design phase to confirm that the proposal will not result in adverse flooding effects greater than those identified in the initial flood model, and offers a condition of consent requiring this.

0.023

3.0 Documents Reviewed

Part B: *Assessment of Environmental Effects and Application for Resource Consent – Hunua Quarry Development (AEE)* prepared by Boffa Miskell, dated 30 March 2026, and the following appendices specific to our area of expertise:

- Appendix B12.4.15 Flood Risk Assessment
- Appendix B12.3aa Plans of the Proposal_20260330
- Appendix B12.3ab Plans of the Proposal_20260330
- Appendix B12.3ac Plans of the Proposal_20260330
- Appendix B12.3ad Plans of the Proposal_20260330
- Appendix B12.3ae Plans of the Proposal_20260330
- Appendix B12.4.16 Hunua Quarry Development Geological and Resource Assessment_20260330
- Appendix B12.4.6a Mangapū Tributary Realignment – Preliminary Design and Effects Technical Report_20260330
- Appendix B12.4.6b Mangapū Tributary Realignment – Preliminary Design and Effects Technical Report_20260330
- Appendix B12.3c Written Approval_20260330
- Appendix B12.4.13 - Stream Crossing Report
- Appendix B12.8.7 - Stream Realignment Management Plan
- Appendix B12.7: Draft Conditions dated 9 June 2026
- Appendix B12.4.8: Geotechnical Assessment Report
- RFI Response memorandum prepared by PDP dated 18th June 2026 (Stormwater and Flooding)

4.0 Additional Reasons for Consent Not included in AEE

No additional consent is required.

5.0 Specialist Assessment

Geotechnical – John Newsome

From a geotechnical perspective, the provisions at H28.7.2 (2) of the AUP and E36.7.1 (4) of PC120 are relevant to the assessment of this application.

I have made myself familiar with this application and wish to comment specifically on the geotechnical aspects submitted. In particular, I have reviewed the Tonkin and Taylor Geotechnical Assessment Report dated March 2026 job number 1099889.1000 v5. This report gives me confidence that the author has a great understanding of the geology of the site, the characteristics and behaviour of materials in the quarry, and the effect of the proposed staged expansion works. In this regard I cannot see any issues or concerns from a geotechnical perspective, with respect to either internal bench stability within the quarry or external land stability outside the quarry footprint or subject site, should approval be given.

Whilst the report may not address the possibility of road works such as carriageway widening outside of the property, I don't foresee any particular concerns given the inherent overall stability of the greywacke rock mass present. Similarly with works to form the modified entranceway onto the site, there are no concerns regarding these works.

0.024

Streamworks and Overland Flow Path – Maria Baring

Earthworks are proposed within a mapped major overland flow path, being the Mangapū Stream Tributary. The applicant has commented that "the rules associated with overland flow paths do not apply to permanent streams as per definitions in the Auckland Unitary Plan and as modified by PC120." While I concur with this, consideration of potential adverse flooding effects from this diversion is still relevant and required.

0.025

A temporary bridge is proposed for a maximum period of five years to enable construction of the diversion channel and support progression of Stages 3 and 4 of the quarry development. The bridge will be located within the conveyance corridor of the watercourse.

The proposal also accommodates the reclamation of other tributaries and supporting minor overland flow paths within the quarry area.

The proposed earthworks and diversion of the watercourses and minor overland flow paths may adversely affect overland flow characteristics of the area or increase the potential volume or frequency of flooding on the surrounding site.

0.026

The *Mangapū Tributary Realignment – Preliminary Design and Effects Technical Report* [Appendix B12.4.6a and Appendix B12.4.6b] prepared by Boffa Miskell includes initial modelling for the 1% AEP 100 year flood event and identifies an overland flow path associated with the existing Mangapū Tributary alignment.

The PDP memo dated 18 June 2026 indicates that the proposed realigned channel is expected to perform similarly to, or slightly better than, the existing arrangement during smaller flood events. However, to fully assess the flood effects of the proposed stream realignment, detailed flood modelling will be required at the detailed design stage. A condition of consent has been offered requiring this. A condition of consent has also been proffered requiring a Stream Realignment Management Plan to be prepared, which includes a requirement for a refined hydrological assessment and methods for managing and diverting upstream flows. A minor amendment to this condition is recommended to make it clear that the methods for managing and diverting upstream flows should consider flooding matters as well as ecological.

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Management of other minor overland flow throughout the site has not been commented on in the application, however I am satisfied that this can be adequately managed throughout works.

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Overall, it is anticipated that with suitable management of all works any potential adverse flooding effects can be suitably managed and avoided. The offered conditions of consent pertaining to further flood modelling and the Stream Realignment Management Plan condition are considered appropriate to ensure management of these works is suitably undertaken throughout works, subject to minor amendments.

6.0 Section 67 Information Gap

We have not identified any Section 67 information gaps.

7.0 Recommendation

We have completed a high-level assessment based on the information available, and with additional /amended conditions as suggested below we support the proposal.

8.0 Proposed Conditions

The following comments have been provided based on the conditions document dated 14/07/2026.

A recommended condition was proposed by PDP Memorandum dated 18 June 2026 as follows:

“Prior to finalising the detailed design of the diversion channel, hydrodynamic modelling shall be undertaken using the most up to date design to verify the downstream flooding effects. The modelled final design must not result in adverse flooding effects greater than those indicated by the initial flood model levels stated in the Technical Report”.

This has not been accommodated in the 14th July version of conditions as drafted by PDP, however an alternative is included at Condition 66:

66. Prior to finalising detailed design of the diversion channel, hydrodynamic modelling must be undertaken using the most up to date design to verify downstream flooding effects. Modelling outputs will need to demonstrate the following flood levels will not be exceeded:

- a) 50mm in forested areas; and/or
- b) Up to 15mm in rural residential area; and/or
- c) No flooding effects on existing buildings.

This is considered appropriate.

The proposed Stream Realignment Management Plan (conditions 64 and 65) is considered appropriate and necessary to ensure the stream realignment is suitably managed. A minor amendment is, however, recommended to ensure this clearly requires detail on management of flooding/overland flow to avoid ponding and/or other adverse effects.

65. The SRMP must include the following

...

(e) methods for diverting upstream flows during the streamworks, including how upstream ponding and/or other adverse flooding effects up and downstream will be managed and avoided during works and how sufficient ...

We support all other recommended conditions of consent and have no further comments.

0.029

0.030

Technical Specialist Memo - Hunua Quarry Expansion – 489 Hunua Road, Groundwater Assessment

To: Emma Chandler – Lead Planner & Warwick Pascoe - PPL

From: Nick Hazard

Qualifications & Relevant Experience: I hold a Bachelor of Science in Geology and Economics and a Post Graduate diploma in Hydrogeology. I am a member of the International Association of Hydrogeologists, the New Zealand Hydrological Society and the Geological Society of New Zealand. I have prepared expert evidence and technical assessments for resource consent applications and fast-track applications and have appeared as an expert witness before consent authorities on multiple occasions.

Preparation in Accordance with the Code of Conduct: I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Date: 28 July 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name: Hunua Quarry Expansion

Fast-Track application number: FTAA-2603-1185 (Council Reference BUN60464053)

Site address: 489 Hunua Road, Hunua

2.0 Documents Reviewed

- Assessment of Environmental Effects and Application for Resource Consent, prepared for Winstone Aggregates by Boff Miskell Limited, dated 30 March 2026. (AEE)
- Appendix B12.8.12 Groundwater Monitoring and Contingency Plan (revised 22 June 2026), Winstone Aggregates.
- Appendix B12.4.9a & b Hunua Quarry Development Groundwater Effects Assessment and Drawings
- Appendix B12.4.5a & b Ecological Effects Assessment and Drawings
- Appendix B12.7.8 Resource Consent Technical Assessment Geotechnical.
- Several historical documents relating to prior consents listed in Section 8.0 References, of Appendix B12.4.9a

3.0 Specialist Assessment

The above documents have been reviewed with respect to the taking and using of groundwater, the dewatering of the ground around the quarry and the effects of stream diversion. The application relates to the expansion of the quarry, notably deepening the quarry pit from RL-5m to RL-50m. These activities require consent under the following rules of the Auckland Unitary Plan rev 12 June 2026 (AUP):-

- E7.4.1 (A13) Diverting Surface Water not meeting Permitted Activity A11 is a Discretionary Activity.
- E7.4.1 (A26) The Take and Use of Groundwater not meeting the Permitted Activity A15 is a Discretionary Activity.
- E7.4.1 (A28) The diversion of groundwater caused by any excavation or tunnel not meeting the Permitted Activity A27 is a Restricted Discretionary Activity.

Under the Resource Management (National Environmental Standards for Freshwater) Regulations, consent is required under Regulation 45A (4) where the taking, use, damming or diversion of water within, or within a 100m setback from a natural inland wetland if the activity is for the purpose of quarrying activities, there is a hydrological connection to the wetland and the activity is likely to change the hydrological function of the wetland. Consents required under Regulation 45A (4) have a Discretionary Activity status.

My review has focused on the assessed '*Envelope of Effects*' or the groundwater drawdown cone and the related effects of this groundwater drawdown. The applicant relies heavily on a long history of monitoring to assess the future effects of the proposed expanded pit shell. I concur with this approach.

I agree with the outline of geological characteristics, groundwater flow, the Hunua greywacke block conceptual model, groundwater and surface water interaction and the values for hydraulic conductivity as outlined in Appendix B12.8.12, PDP (2026).

I agree with the assessment of effects outlined in Appendix B12.8.12, PDP (2026) with respect to the groundwater inflow to the quarry pit, the effect on the resource availability, effects on the Watercare dam, effects on stream low flows within shallow groundwater and effects on stream low flows within regional groundwater. Mitigation by way of stream flow augmentation is offered in consent conditions should there be an identified loss of stream base flow due to quarry dewatering.

In respect to the current and future zone of influence (*'Envelope of Effects'*) I agree with the trigger levels provided in Schedule A which correspond generally to Figure 20 *'Symonds Hill Pit Zone of Influence for Dewatering Level at RL-50m and Estimated Drawdown Contours'* from Appendix B12.8.12, PDP (2026).

Discussion in Appendix B12.8.12 outlines existing drawdown effects and states that bores HUN5/2U, HUN4/12 and the Glasgow bore have not been affected by any drawdown based on the AMRR method (*Accumulative Monthly Residual Rainfall*) to justify this viewpoint. I disagree that these bores (*and some others*) have not been affected by dewatering. In my view, based on the available monitoring data, there appears to be some groundwater drawdown taking place, although not significant, in the bores listed above. It is important that groundwater drawdown trends are identified to plan for any mitigation if required. Ongoing monitoring, required by proposed conditions of consent will confirm either way what the drawdown effects are.

0.088

I disagree with the use of AMRR for establishing groundwater trends in the Hunua Quarry environment. The methodology was developed for shallow aquifers in Western Australia. Factors such as shallow perched groundwater in the weathered profile and overlying Waitemata Group rocks and soil preclude a direct connection between rainfall infiltration and the underlying deep greywacke aquifers. This increases the complexity of the recharge mechanism and determining a linkage between rainfall and fluctuations in groundwater levels. This disagreement does not have a significant bearing on my assessment of the proposal as offered conditions of consent in particular the ongoing monitoring and the establishment of groundwater level triggers listed in Schedule A of the consent conditions alleviate any concerns.

0.089

In respect of effects on neighbouring farm bores I agree with the assessment discussion and support the mitigation offered to bore owners where quarrying related groundwater drawdown affects the ability of any bore owner to access their legal right to water. However, in relation to the assessed *'Envelope of Effects'* in Appendix B12.8.12, PDP (2026) I disagree with the presentation of the drawdown effects presented in Table 11. The drawdown values assigned to 9 of the 20 bores in this table are not consistent with Schedule A and do not provide limits to the extent of groundwater drawdown north of the quarry. Two private bores in particular (ID5421 and LUC60317641) are located on the northern extent of the drawdown limit as shown in Figure 20 Appendix B12.8.12. The bores are expected to experience less than 5m of drawdown using the Figure 20 assessed effects at RL-50m however Table 11 shows these bores having up to 114.9m of drawdown. In contrast bore ID20479 also in Table 11 and located 1.5km closer to the Symonds Hill pit, is indicated to have only 25m of drawdown.

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0.092

The above matter was raised with PDP. They have stated they are taking a conservative approach and have used the historic drawdown slope, presented as Figure 15, to justify the extent of drawdown in bores where little is known of their construction. However, if the drawdown at bore ID5421 did reach the level stated in Table 11 then there would be significant additional effects on stream baseflow, a likely increase in quarry inflows and groundwater drawdown in bores not addressed in the application. These effects would extend well beyond those presented in Figure 20 and 21.

0.093

The significant drawdown prediction in Table 11 is, however, modified by the trigger levels presented in Schedule A and in particular proposed condition 171(a) presented below. This condition provides that if the consent holder is unable to comply with Schedule A trigger levels, then an application will be required for a change to consent conditions to seek a greater assessed envelope of effects. This addresses any concerns around the presentation of Table 11 in Appendix B12.8.12 of the AEE.

0.094

The Schedule A provided in the condition set did not specify drawdown trigger levels for four farm bores. I have added in these missing values based on those presented in earlier consent documents. The applicant has agreed to these but has sought for these to be referred to as provisional until such time as new monitoring data is obtained. I have agreed to this and to the addition of an advice note to Schedule A to specify how the trigger levels are to be confirmed.

0.095

In respect of the potential adverse effects that could be caused by the proposed stream diversion of Mangapu Stream, condition 63 and 64 (and other related conditions) requiring a Stream Realignment Management Plan (SRMP) requiring design, construction, long term establishment plan and appropriate monitoring to be detailed before commencement provides sufficient confidence that matters of discretion under E7.4.1 (A13) of the AUP will be adequately addressed. Other specialists have assessed the ecological effects.

0.096

In respect to the effects on Stevensons Drury Quarry Expansion -Sutton Block (Consent WAT60449477, 60449478, 60449479) I am accepting of the assessment provided and have no concerns that the proposal will affect the operation of Drury Quarry over the life of any consent granted as a result of this application. I concur with the assessed additional effects of the Stevenson Drury Quarry Expansion – Sutton Block presented as Figure 21 in Appendix B12.8.12 of the AEE. Should this occur it will be towards the end of the life of the proposed expansion of both quarries.

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The existing monitoring bores are critical in determining that the drawdown effects of the quarry remain within the assessed 'Envelope of Effects'. In my review a key concern was that many of the monitoring bores will not be sufficiently deep enough to monitor the full extent of the drawdown. It is important that replacement bores are constructed ahead of time to enable correlation between the existing bores and their replacements. The concern is that monitoring bores will dry out before a replacement has been drilled. This concern has been addressed by the inclusion of condition 177.

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A review of consent conditions offered in the AEE as Appendix B12.7 identified that multiple conditions covering a wide range of monitoring aspects from the three existing consents had not been included. I reviewed all the prior conditions and provided a revised condition set to the applicant for review. These have all been accepted by the applicant with a few minor changes. Most of the additional conditions are reflected in the revised Draft Consent Conditions dated 22 June 2026. Additional discussions with the applicant and a final review of

0.099

the conditions identified some additional changes to conditions and incorrect condition references. These are documented below.

4.0 Recommendation

From a groundwater perspective I have not identified any significant issues that would preclude granting of these consents.

Should the Expert Panel choose to grant this application I support the groundwater take and diversion conditions proposed in revised Draft Consent Conditions dated 22 June 2026 but with the inclusion of additional conditions and changes outlined below. The changes presented below have been agreed with the applicant. There are no disagreements. The condition numbers below and the internal references below relate to the revised Draft Consent Condition set dated 22 June 2026.

The only point of difference with the applicant is the reference to a new condition set dated 14 July provided to the panel on the 22nd July 2026. The applicant has responded to my changes with different condition numbers from the 14 July 2026 condition set which I have not sighted.

Condition references within the groundwater conditions are required to be checked before issuing the final condition set.

5.0 Proposed Conditions, amendments and comments

Condition

174	<u>Comment</u>
	Change agreed with the applicant. The applicant states 'Condition number is 177 as per 14th July version'. I have not viewed this condition set and therefore references to condition numbers need to be checked prior to issuing the final condition set. Condition 174 minor amendment as follows:- <i>A Technical Review must be undertaken no less than 3 months prior to commencing each of the two three successive steps of dewatering identified in Condition 174 173. The Review must include an analysis of monitoring data, a comparison of actual groundwater level values to predicted values, and an assessment of any implications these results may have for on-going management of any actual or potential adverse effects as a consequence of dewatering. The Technical Review must provide a more detailed analysis and interpretation of monitoring data than the Annual Monitoring Report required in accordance with Condition 67. The Consent Holder must forward the Technical Review to the Council within one (1) month of the completion of the Review.</i>

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	<i>Advice Note: If the Technical Review shows that the effects of the activity are greater than predicted in the application and that monitoring and mitigation provisions of this consent are not adequate for the scale of effects, then Council may review the consent conditions in accordance with the provisions of Condition 70.</i>
181	<u>Comment</u> Agreed with the applicant. (applicant advises it is new condition 184 assumed to be in the condition set 14th July.) Condition 181 should be amended as follows:- <i>Monthly monitoring of bores ID 1218 and 20013 must recommence in the event that groundwater drawdown is detected in bore HUN12/4U or HUN12/4L, and monthly monitoring of bore ID 21817 must recommence in the event that groundwater drawdown is detected in bores ID421, HUN12/8U or HUN12/8L. Monitoring in these private bores is subject to access being available otherwise requirements under condition 177 apply.</i>
182(e)	Minor amendment refer to condition 66 not 67. The applicant states 'Disagree. The correct reference is Condition 70 as per Condition set dated 14th July.'
184	<u>Comment</u> Agreed with the applicant. (applicant advises it is new condition 187 assumed to be in the condition set 14th July.) The amended condition is as follows:- <i>The Consent Holder must:</i> (a) <i>measure and record water levels in the bores listed in Schedule A (or use best endeavours with respect to the private bores 830, 20013, 20479, and 21474 (Glasgow bore)) at monthly intervals</i> (b) <u>measure and record water levels in bore ID421 (or use best endeavours) at quarterly intervals from the date of commencement of this consent.</u> (c) <i>measure and record the water level from the top of the casing to the nearest 0.01 of a metre (i.e. the nearest centimetre). The bores operated by the Consent Holder must not have been pumped for at least 24 hours prior to the water level measurement being taken; and</i> (d) <i>keep records of each date and corresponding water level for each bore.</i>
186	Condition 186 minor amendment refer to condition 66 not 67. Applicant states 'Disagree. The correct reference is Condition 70 as per Condition set dated 14th July'

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187	<u>Comment</u> The applicant states 'Condition numbering references have already been updated as per the Conditions set dated 14th July' Condition 187 minor amendment as follows:- <i>The Consent Holder must include the records required under Conditions 484 182– 485 186 above in the Quarterly and Annual Monitoring Report required by Conditions 66 and 67. The records must include details of the measurement procedure employed, records of rainfall prior to and during the measurement, and the time and corresponding water level measurements within the Symonds Pit Sump.</i>	0.109
191	<u>Comment</u> The applicant states 'Agree additional number updates required, however correct referencing as follows:-' '.....under Condition 189 188 to 190 192 to 194 above in the Annual Monitoring Report required by Condition 67-70.' It is assumed the numbering change above is as per the 14th July condition set. For the 22 June condition set Condition 191 should be amended as follows:- <i>That the Consent Holder must include records required under Condition 489 188 to 190 above in the Annual Monitoring Report required by Condition 67. The records must include details of the method, dates and times of the gauging procedure employed, all measurements taken and flow calculations.'</i>	0.110 0.111
193	<u>Comment</u> Applicant agreed. Condition 193 refers to Hays Stream and Symonds Stream - This should be referred to as Waipokapu, Mangapu.	0.112
199-205	<u>Comment</u> Changes to conditions 199 to 205 relating to Augmentation Water Quality are deferred to Andrew Rossack (Council's consultant ecologist), however I do note that condition references in Condition 204 are incorrect as follows:- <i>Monitoring at two-weekly intervals must recommence upon written instruction from AC in the event of a material change in the augmentation flow source or pumping system.</i> <i>If monitoring required by Condition 482 199 identifies an increase in the parameters listed in Condition 485 202 caused by the exercise of this consent, the consent holder must prepare and submit to the Council a mitigation plan outlining mitigation measures to be implemented to address such effects.</i>	0.113

206 (a)	<u>Comment</u> Applicant agreed. Condition 206 (a) refers to Hays, Symonds and Waihoihoi Streams.... This should be referred to as Waipokapu, Mangapu and Waihoihoi Streams.
207-211	<u>Comment</u> Applicant agreed. Conditions 207, 208, 209, 210, 211 all refer to Symonds Stream when it should be Mangapu Stream to be consistent.
208	<u>Comment</u> Applicant agreed. Applicant states 'This error was addressed in the 14th July conditions set provided to the Panel 22nd July' Condition 208 has a typo – refers to condition 2019 it should be 177.
215	<u>Comment</u> Applicant agreed. Applicant states 'Agree but should be Condition 219' Condition 215 should be revised as follows:- <i>In the event that groundwater drawdown is such that <u>in either or both</u> monitoring bores HUN12/8U on Hunua Road <u>or ID421 on Jack Paterson Drive</u> equals or exceeds the trigger value in Schedule A then:</i> (a) <i>The Consent Holder must cease any further drawdown at the Symonds Hill Pit and within seven (7) days must notify the Council in writing and by telephone of the exceedance of trigger levels. Drawdown must not recommence without the Council's written approval;</i> (b) <u>Etc etc (a, b, c and d unchanged)</u>
170 (a)	<u>New Condition</u> <u>Comment</u> Agreed with the applicant. Condition 170a <i>The daily abstraction from the Symonds Stream augmentation bore (HUN 14/8 or any replacement) must not exceed 1,400m³.</i>

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171 (a)	<u>New Condition</u> <u>Comment</u> Agreed with the applicant. Applicant states ‘<i>This condition seems to have been deleted by mistake. Happy to accept</i>’ <i>Condition 171a</i> <i>In the event that groundwater drawdown is such that any of the deep monitoring bores operated by the Consent Holder equal or exceed any trigger values in Schedule A then the Consent Holder must cease any further water level drawdown at the Symonds Hill Pit and within seven (7) days notify the Council in writing and by telephone of the exceedance of trigger levels. The notification must specify which bore trigger(s) have been exceeded, and the quantum of the exceedance for each bore. The Consent Holder must not recommence drawdown unless it is demonstrated that the trigger levels can be complied with to the written satisfaction of the Council.</i> <i>Advice note: The drawdown trigger levels in Schedule A define a consented “Envelope of Effects”. If the Consent Holder is unable to comply with Schedule A triggers, then an application will be required for a change to consent conditions to seek a greater assessed envelope of effects.</i>
189 (a)	<u>Comment</u> Agreed with the applicant. Applicant states ‘<i>This was included in the 14th July conditions as Condition 202</i>’. <i>Condition 189a</i> <u><i>Stream flow monitoring of Taitaia Stream (Taken from Condition 51 of WAT60152106-A)</i></u> <i>When either:</i> <i>(a) the drawdown level in the Symonds Hill_Pit reaches RL20m (or such other RL as agreed in writing by the Manager); or</i> <i>(b) the groundwater drawdown is such that monitoring bores HUN12/4U and HUN12/4L for the Taitaia Stream (Peterson Road) equal or exceed their trigger values in Schedule A then:</i> <i>(i) the Consent Holder must establish and monitor the respective flow gauging site T1 on tributary no. 085150 of the Taitaia Stream at Peterson Road bridge. The site locations must be at approximate Map Reference NZTM 1777090mE 5898840mN (site T1 "Peterson Road") for the Taitaia Stream. The precise</i>

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	<i>locations and monitoring are to be as proposed to and approved in writing by the Manager, after visiting the sites to determine access to, and the suitability of, each location for stream flow measurement.</i> <i>(j) The monitoring must be carried out twice per year. The flow must be measured during dry weather conditions within the period commencing 1 January and ending 30 April of each year. All field measurements and procedures must be in accordance with the National Environmental Monitoring Standards - Water Level v4.0.1 October 2025 (or subsequent versions thereafter), or as agreed in writing with the Council</i> <i>(ii) the Consent Holder must, in consultation with the Manager, engage an expert or experts at the Consent Holder's cost to review stream base flow measurements and records. The expert(s) must assess and report on whether drawdown of groundwater level at the Symonds Hill Pit either has or is likely to have adversely affected baseflow in Tributary 085150 of the Taitaia Stream at Papakura-Clevedon Road; and</i> <i>(iii) if the review and report at (ii) determines that baseflow has or is likely to have been affected by drawdown of groundwater level at the Symonds Hill Pit, then the Consent Holder and the Manager must endeavour to agree an appropriate mitigation regime to be implemented at the Consent Holder's cost. If agreement is not reached within 3 months of receipt of the expert report, then the Consent Holder must implement the determination of the expert review and report. If the Consent Holder does not accept the determination of the expert review and report then the Consent Holder may apply for a change to the consent conditions pursuant to Section 127 of the Resource Management Act 1991.</i>
Schedule A	<u>Comment</u> Trigger levels presented in Schedule A were incomplete in PDP 2026 and in the revised condition set. In particular trigger levels for bores ID20013, ID421, ID21817 and ID1218 are required to complete the groundwater drawdown <i>'Envelope of Effects'</i> and provide the basis for monitoring data to confirm that the extent of assessed effects is not breached. These trigger levels are imperative for the requirements of Conditions 181, 215 and 171 (a). The Trigger levels in bold and underlined below have been added by N Hazard on the basis of historical monitoring data and from historical consent documents which previously provided these trigger levels. The applicant has outlined below that the age of the existing data set may provide unreliable trigger levels and recommends the trigger levels I have

	proposed be provisional until new water level data is obtained. I am accepting of this approach. <u>Applicant Comments</u> <i>Agree with the proposed trigger levels in principle. However, the last reliable water level measurements for bores ID421, 1218, 20013, and 21817 were taken in 2013 - over a decade ago. Local pumping conditions, land use, and groundwater levels may have changed since then. Therefore, I recommend that a new baseline be established before finalising trigger levels. This should include at least one dry season and one wet season measurement (i.e., two measurements approximately six months apart) to account for seasonal variability. Once these new baseline measurements are obtained, trigger levels can be confirmed or adjusted accordingly and incorporated into Schedule A. I have added TBC on trigger levels (or you can add "provisional" if you prefer)</i> <i>Suggested Advice Note (or Condition) on Schedule A (Related to Condition 184):-</i> <u>Advice Note Schedule A</u> <i>Prior to finalising the trigger levels for bores ID421, 1218, 20013, and 21817 in Schedule A, the Consent Holder shall undertake a minimum of two baseline water level measurements in each bore - one during dry season conditions (January - April) and one during wet season conditions (July - October) — to establish current baseline levels. Trigger levels shall then be set based on these measurements plus an allowance for seasonal variation.</i>
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Schedule A – Monitoring Bores and Trigger Levels							
Bore	Map Reference NZTM	Collar Elevation RL(m)	Screen Interval RL(m)	Depth GW (m, RL) Sept 2025	Formation	Screen Length (m)	Drawdown Trigger Values (m, RL)
HUN12/1U	1777118 / 5892865	149.76	135.8 – 129.8	141.42	Greywacke	6	130.21
HUN12/1L	1777122 / 5892866	149.80	17.8-5.8	45.72	Greywacke	12	-66
HUN12/2U	1778103 / 5891943	258.79	226.7-220.7	243.45	Greywacke	6	224.96
HUN12/2L	1778104 / 5891939	259.008	99.5 – 87.5	179.77	Greywacke	12	55.1
HUN12/3U	1776392 / 5895751	100.43	51.2-45.2	58.52	Waitemata	6	43.02
HUN12/3L	1776395 / 5895750	100.53	-30.5- -36.5	28.99	Greywacke	6	-95.2

HUN12/4U	1777313/ 5897789	73.71	44.7-38.7	42.96	Waitemata	6	38.21
HUN12/4L	1777311/ 5897785	73.34	11.5 – 0.5	55.68	Greywacke	12	20
HUN12/5U	1775995 / 5894949	45.63	27.6 – 20.6	28.64	Waitemata	6	18.51
HUN12/5L	1775991 / 5894948	45.72	-46.8 – -52.8	30.54	Greywacke	6	-96
HUN12/6U	1776022 / 5891368	55.67	34.7 – 31.7	35.94	Greywacke	6	28.43
HUN12/6L	1776025 / 5891369	55.86	12.9 – 0.9	34.12	Volcanics	12	27.14
HUN12/7U	1780450 / 5893900	181	30m below ground level		Greywacke		x + SV
HUN12/7L	1780450 / 5893900	181	TBC		Greywacke		x + SV
HUN12/8U	1775555 / 5894902	27.39	22.4 – 19.4	24.56	Scoria / Alluvium	3	21.37
HUN12/8L	1775559 / 5894905	27.44	6.4 - 0.4	22.26	Basalt / Scoria	+6	19.83
HUN05/2L	1778799 / 5894587	142.16	7.16 – 1.16	124.42	Greywacke	+6	6.2
830	1776103 / 5893220	62.12	-3 – -3.4	48.37	Greywacke	31	-66
20013	1776109/ 5898810	39.83	-26.2- -147.9	25.62	Greywacke	121.7	<u>23.4</u> <u>Provisional</u>
1218	1775614 5898253	51.0	-7.8 - -51.0	27.0	Greywacke	<u>43.2</u>	<u>24.6</u> <u>Provisional</u>
421	1775479 5892910	31.59	-4.4 - -28.4	13.85	Volcanic	<u>24.0</u>	<u>10.6</u> <u>Provisional</u>
21817	1775198 5892910	28.5	-10.5 - -32.0	13.71	Volcanic	<u>21.5</u>	<u>10.5</u> <u>Provisional</u>
20479	1776578 / 5896896	127.11	44.3 – 9.7	43.92	Greywacke	34.6	9
21474 (Glasgow)	1779246 / 5894408	194.72	123.2 – 93.3	159.7	Greywacke	29.9	153.19
HUN25/1L	1777654/ 5893543	108.6	1.6 – -4.4	57.1	Greywacke	6	-58
HUN25/1U							

Technical Specialist Memo – Contaminated land

To:

Maria Baring - Project Manager Regulatory Engineering, Auckland Council

From:

Ripul Sachdeva, Senior Traffic Engineer - Auckland Council

Qualifications &
Relevant
Experience:

I hold a Bachelor of Civil Engineering (2012) and a Master of Engineering Studies (2020), both from the University of Auckland, with a specialization in Transportation Engineering. I have 13 years of professional experience in civil and traffic engineering.

I am a Full Member of Engineering New Zealand. My professional experience includes preparing traffic engineering assessments for resource consent and Fast-track applications, and I have provided expert traffic engineering evidence before consent authorities and at Council hearings on numerous occasions.

Preparation in
Accordance
with the Code
of Conduct:

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses ([Code](#)) and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conference, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Date:

1 July 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:

Hunua Quarry Development

Fast-Track application number:

FTAA-2603-1185 (Council Reference BUN60464053)

Site address:

489 Hunua Road, Hunua

2.0 Executive Summary

I have reviewed the transport aspects of the application documentation, including Auckland Transport's (AT) memorandum dated 22 June 2026. My assessment focuses primarily on the internal operation of the proposed quarry roading network and access arrangements within the application site.

In addition, I have undertaken a high-level review of transport matters external to the site, including the surrounding road network and the interface between the quarry access and the existing public road network. This review is limited in scope, as AT has undertaken the detailed assessment of the wider transport network. I confirm that I agree with the transport issues and deficiencies identified in AT's assessment. Auckland Council has reviewed the substantive application for the Hunua Quarry Development and acknowledges that the proposal has the potential to generate adverse effects on the surrounding transport network and on road user safety. These matters have been comprehensively considered by AT. Subject to the matters identified in this memorandum and the recommended conditions of consent, I support the proposal from a traffic engineering perspective.

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The application seeks to increase annual quarry production from approximately 2.94 million tonnes to a peak production of approximately 5.4 million tonnes, while extending the operational life of the quarry by approximately 50 to 81 years.

Based on the surveyed operational data, the existing quarry generates approximately 76 heavy commercial vehicle (HCV) movements during the AM peak hour and 64 HCV movements during the PM peak hour. Under the proposed development, HCV movements are anticipated to increase to approximately 161 movements during the AM peak hour (an increase of 85 movements) and 135 movements during the PM peak hour (an increase of 71 movements).

To accommodate the increased vehicle activity, the proposal includes the construction of a dedicated right-turn bay at the existing quarry access on Hunua Road. The proposal also includes the installation of Audio-Tactile Profile Markings (ATPM) (rumble strips) on the approach to the sharp bend near the quarry entrance, where two reported crashes occurred in 2023 and 2025, to improve driver awareness and road safety.

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Auckland Council also acknowledges that Hunua Quarry has operated for over 100 years and is recognised as one of Auckland's three strategically significant aggregate sources, making an important contribution to the region's supply of construction materials.

3.0 Documents Reviewed

- Assessment of Environmental Effects and Application for Resource Consent – Hunua Quarry Development (AEE) prepared by Boffa Miskell, dated 30 March 2026
- Appendix B12.4.14: Traffic Assessment prepared by Commute Transportation Consultants, dated 26 March 2026
- “FTAA Hunua Quarry Development- Specialist Traffic Comments Response” prepared by Commute Transportation Consultants, dated 19 May 2026
- *Draft Conditions dated 19 May 2026.*

4.0 Additional Reasons for Consent Not included in AEE

There are no additional reasons for consent identified by AT that are not included in the AEE.

5.0 Specialist Assessment

During the review of the application, clarification and additional information were requested on the following transport-related matters:

1. Supporting plans demonstrating that the width of the internal haul roads, including any widening through bends, is sufficient to accommodate the simultaneous ingress and egress of the largest design vehicle (i.e. truck and trailer units).
2. Confirmation that the internal haul road will be sealed for a minimum distance equivalent to at least two truck-and-trailer lengths from the site access (or a greater sealed length where practicable).
3. Confirmation that any proposed lighting is limited to that required for the operational needs of the quarry and is designed to avoid light spill and adverse effects on neighbouring properties. Where applicable, supporting lighting information should be provided.

Following discussion with the processing planner, it was agreed that the proposed consent condition requiring the first 50 metres of the internal access road to be sealed (Condition 71) adequately addresses Item 2.

With respect to Item 1, I advised that additional information should be provided to enable an appropriate assessment of the internal haul road geometry. In particular, plans should 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.

For Item 3, I agreed that confirmation should be sought regarding whether any additional lighting is proposed for the new haul roads and that any new lighting should comply with the relevant Auckland Unitary Plan lighting standards. While I considered that an updated lighting plan would be beneficial, particularly given the proposed operational timeframe of approximately 50–80 years, I acknowledged that this could be addressed as a note or through future detailed design rather than as a specific information requirement for the current application.

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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. 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.

6.0 Recommendation

Draft Condition 50 – Lighting Plan

The applicant advised, in response to Council's preliminary request for further information, that additional consent conditions would be offered to address internal lighting. Emma Chandler recommended that the lighting condition be incorporated within the monitoring plan requirements, with a lighting plan to be prepared and submitted to Auckland Council for certification. This approach would ensure that the final lighting design demonstrates compliance with the relevant standards and would facilitate efficient monitoring of any future lighting-related issues.

I supported this approach and further recommended that the lighting plan be prepared and certified by a suitably qualified lighting engineer prior to submission to Auckland Council.

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Draft Condition 76 – Material Deposited on Hunua Road

To minimise adverse effects on the surrounding road network and maintain road safety, I recommended that Draft Condition 76 be amended as follows (additional wording shown in bold |underline):

"Any material deposited onto Hunua Road must be removed **immediately or as soon as practically possible**. Roads must not be washed down with water without appropriate erosion and sediment control measures in place to prevent contamination of any stormwater drainage system, watercourses or receiving waters."

This amendment clarifies the expectation that any road cleaning activities are undertaken in a manner that protects the stormwater network and receiving environment while maintaining the safety and functionality of the public road.

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7.0 Proposed Conditions and Conclusion

Auckland Council reviewed the applicant's draft consent conditions dated 19 May 2026. From a traffic engineering perspective, I recommended the inclusion of the following additional conditions.

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.

Conclusion

I have reviewed the transportation aspects of the proposed Hunua Quarry Development, with particular emphasis on the internal quarry roading network, site access arrangements, and the interface with the public road network. I have also undertaken a high-level review of the potential effects on the surrounding transport network, noting that Auckland Transport has undertaken the detailed assessment of the wider road network and associated transportation effects.

Subject to the matters identified in this memorandum and the recommended consent conditions, I am satisfied that the proposed internal transport infrastructure can be designed and operated to support the quarry activities in a safe and efficient manner. I agree 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.

While I recommended that additional consideration be given to the operational design of the internal haul roads to minimise reversing manoeuvres by heavy vehicles, it was ultimately concluded that these matters relate to internal quarry operations and are outside the scope of this resource consent. I acknowledge that position.

Overall, from a traffic engineering perspective, I support the proposal, subject to the recommended consent conditions and the implementation of the proposed transport mitigation measures.

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Technical Specialist Memo – Contaminated land

To:

Emma Chandler – Lead Planner (Consultant) & Warwick Pascoe - Principal Project Lead, Auckland Council

From:

Nagaraj Prabhakara, Principal Planner- Auckland Transport

Qualifications & Relevant Experience:

I hold the qualifications of: Bachelor of Civil Engineering and Master of Engineering Studies, majoring in Transportation, and have 20 years of experience in Civil and Traffic Engineering. I am a full member of Engineering New Zealand. I have prepared expert evidence and technical assessments for resource consent applications and fast-track applications and have appeared as an expert witness before consent authorities and at hearings on multiple occasions.

Preparation in Accordance with the Code of Conduct:

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses ([Code](#)), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Date:

22 June 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:

Hunua Quarry Development

Fast-Track application number:

FTAA-2603-1185 (Council Reference BUN60464053)

Site address:

489 Hunua Road, Hunua

2.0 Executive Summary / Principal Issues

Auckland Transport (**AT**) has reviewed the Hunua Quarry Development substantive application and considers there is the potential for significant adverse impacts on the road network and the safety of road users.

The proposal seeks to increase annual quarry production from 2,943,052 tonnes to a peak of approximately 5,400,000 tonnes, and to enable extraction for a further 50–81 years.

Based on the survey data, the existing quarry operation generates 76 Heavy Commercial Vehicle (HCV) truck movements in the AM peak hour and 64 truck movements in the PM peak hour.

The anticipated truck trip generation from the proposed extraction is:

- 161 truck movements in the AM peak hour (an increase of 85 trips), and
- 135 truck movements in the PM peak hour (an increase of 71 trips).

The proposal includes a new right-turning bay at the existing vehicle crossing, along with Audio-Tactile Profiled marking (ATP) (“rumble strips”) at the sharp bend on Hunua Road, where two crashes were recorded in 2023 and 2025.

AT acknowledges that the quarry has been in operation for over 100 years and is one of Auckland’s three most strategically important sources of aggregate.

However, AT recommends that the applicant provide additional information to address safety and operational concerns. 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.

The applicant has proposed installing ATP along the centreline of the carriageway at the Hunua Road bend as a mitigation measure to discourage vehicles from crossing the centreline.



Image 1: Google street view at the bend.

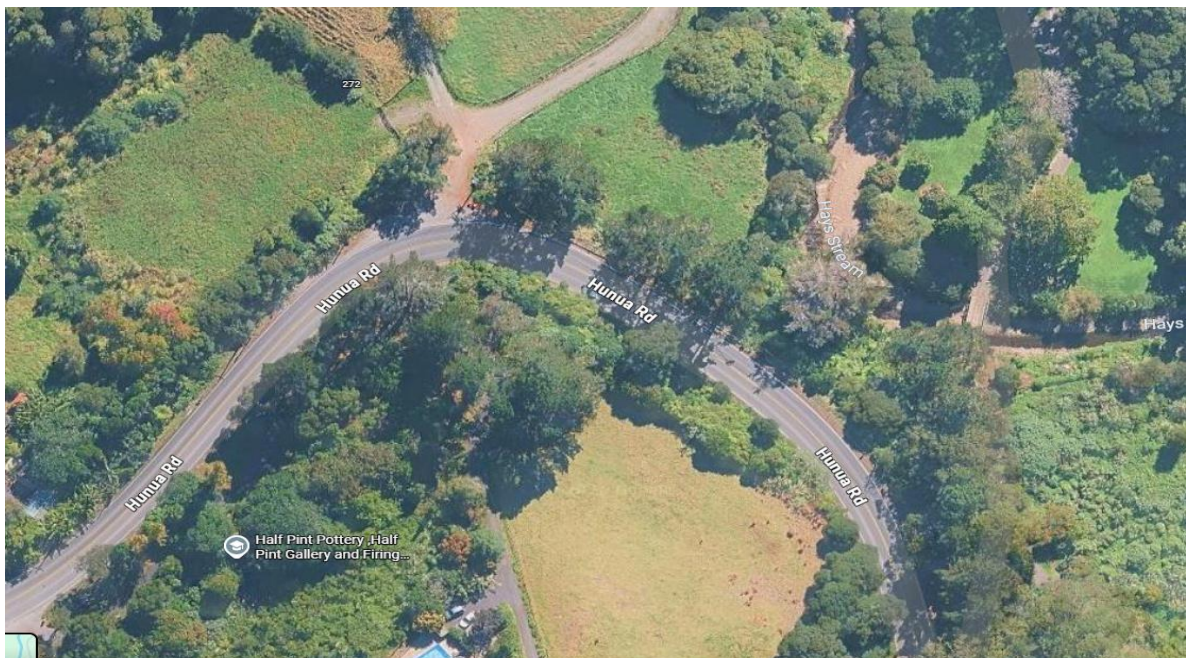


Image 2: Aerial view at the bend.

A meeting was held with the applicant on 4th June 2026 to discuss the traffic matters raised by AT. AT and the applicant's representatives were generally in agreement with AT's recommended conditions and advice notes, except in relation to the proposed road improvement works at the existing bend.

The applicant's traffic engineer, Commute Transportation Consultants, provided a response dated 16th June 2026 addressing AT's further information request on traffic and road safety matters.

The applicant offered a condition, that the consent holder must obtain a separate Engineering plan Approval from Auckland Council for the proposed works within the Hunua Road carriageway, which includes installation of ATP, road carriageway widening works, carriageway upgrade works near the vehicle entrance including carriageway pavement upgrade works with a right turning bay prior to carrying the works within the public road carriageway.

According to the applicant's traffic engineer's response, the proposed ATP will mitigate safety risks at the bend.

AT's traffic and road safety specialist reviewed the applicant's response, the proposed ATP are considered unlikely to mitigate the safety risks. The mitigation measures should also include improvement to the sightlines between the opposing traffic vehicles at the bend to increase reaction time, reduce centreline encroachment risk, improve safety of heavy vehicle interaction and have a direct reduction in crash likelihood and severity.

3.0 Documents Reviewed

- Assessment of Environmental Effects and Application for Resource Consent – Hunua Quarry Development (AEE) prepared by Boffa Miskell, dated 30 March 2026
- Appendix B12.4.14: Traffic Assessment prepared by Commute Transportation Consultants, dated 26 March 2026
- S67 response titled "FTAA Hunua Quarry Development- Specialist Traffic Comments Response" prepared by Commute Transportation Consultants, dated 16 June 2026
- Appendix B12.7: *Draft Conditions dated 9 June 2026.*

4.0 Additional Reasons for Consent Not included in AEE

There are no additional reasons for consent identified by AT that are not included in the AEE.

5.0 Specialist Assessment

Visibility/Sightlines at Hunua Road bend.

Two serious crashes were recorded at the Hunua Road bend in 2023 and 2025, indicating an existing and ongoing safety concern. The horizontal curvature, combined with vegetation and roadside features, restricts sightlines between opposing vehicles. Please refer to image 1.

The proposed additional truck movements associated with the activity are likely to increase safety risks, particularly due to the reduced visibility for oncoming traffic at the bend. Heavy vehicles require greater stopping distances and occupy more lane width, further exacerbating the risk of conflict within this constrained section of road.

Image 4: Proposed road widening works at the vehicle entrance at Hunua Road.

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.

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6.0 Section 67 Information Gap

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.

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7.0 Recommendation

AT has reviewed the draft consent conditions provided by the applicant (dated 9 June 2026) and recommends the inclusion of an additional condition to improve sightlines at the Hunua Road bend.

8.0 Proposed Conditions

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.

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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.

2. Road Safety Mitigation – Sight Distance Improvements

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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.

Advice notes:

Engineering Approval

Prior to the commencement of any engineering works within the road reserve, the consent holder must submit engineering plans to the Council for approval in writing.

The engineering plan application forms including fees can be found at the following Auckland Council website:

<https://www.aucklandcouncil.govt.nz/building-and-consents/engineering-approvals/Pages/default.aspx>

Corridor Access Requests

The consent holder will need to obtain a Corridor Access Request approval from Auckland Transport for the proposed works within the road reserve.

It will be the responsibility of the consent holder to determine the presence of any underground services that may be affected by the applicant's work in the road reserve. Should any services exist, the applicant must contact the owners of those and agree on the service owner's future access for maintenance and upgrades. Services information may be obtained from <https://www.beforeudig.co.nz/>.

All work in the road reserve must be carried out in accordance with the general requirements of the National Code of Practice for Utility Operators' Access to Transport Corridors <https://nzuag.org.nz/wp-content/uploads/2018/11/National-Code-amended-version-29-Nov-2018.pdf> and Auckland Transport Design Manual <https://at.govt.nz/about-us/manuals-guidelines/transport-design-manual/>

Prior to carrying out any work in the road corridor, the consent holder must submit to Auckland Transport a Corridor Access Request (CAR) and temporary Traffic management plan (TMP), the latter prepared by an NZ Transport Agency qualified person and work must not commence until such a time as the applicant has approval in the form of a Works Access Permit (WAP). The application may be made at <https://at.govt.nz/about-us/working-on-the-road/corridor-access-requests> and 15 working days should be allowed for approval.

**Specialist Response Template – Fast-track Approvals Act 2024 –
 Substantive Application**

Technical Specialist Memo – Air Quality

To: Emma Chandler Planning Consultant & Warwick Pascoe Principal Project Lead

From: Loufs Boamponsem

Qualifications
& Relevant
Experience:

I hold a PhD in Environmental Science degree from The University of Auckland (specialising in air quality monitoring and assessment). I have 13 years' experience in air quality monitoring, research and broad environmental science lecturing including more than 20 published articles.

I am employed as a Senior Specialist within the Contamination, Air and Noise team of the Specialist Unit, Planning and Resource Consents Department, Auckland Council. I have held this role since May 2024 and am principally involved in evaluating and preparing specialist and technical input to resource consenting issues and proposals. I was previously employed by the Research and Evaluation Unit (RIMU), Auckland Council as an Air Quality Scientist.

Preparation in
Accordance
with the Code
of Conduct:

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses ([Code](#)), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Date: 20/4/2026

1.D APPLICATION DESCRIPTION

Application and property details

Fast-Track project name: Huihua Quarry Expansion

Fast-Track application number: FTAA-2603-1185 (EPA reference) + BUN60464053 (Auckland Council reference)

Site address:

Hunua Quarry Expansion – 489 Hunua Road, Hunua

2.0 Executive Summary / Principal Issues

I have reviewed the Hunua Quarry Development application lodged under the Fast-track Approvals Act 2024. My review has focused on the air quality aspects of the proposal, including the potential for dust related nuisance and human health effects under both the existing and expanded quarry operations.

Hunua Quarry is a long-established, aggregate operation, and the proposal represents a continuation and spatial expansion of quarrying activities rather than the introduction of new or atypical air quality effects. The primary air quality contaminants of concern remain dust related, including Total Suspended Particulates (TSP), particulate matter (PM₁₀), and respirable crystalline silica (RCS).

Based on the existing air quality monitoring data from the site, current operations have generally achieved good air quality outcomes, with low ambient PM₁₀ concentrations measured at sensitive receptors and a very limited number of short duration dust exceedances. There is no evidence from the existing environment to suggest significant adverse human health effects arising from PM₁₀ emissions associated with the quarry.

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In relation to the proposed expansion, PDP (the applicant's consultant) concludes that while the scale and duration of quarrying activity will increase, the nature of air discharges will not materially change, and hourly extraction and processing rates will remain unchanged. The assessment identifies that the most challenging dust scenarios may arise during overburden stripping in later stages; however, these effects are expected to be localised, intermittent, and manageable with the continuation of established mitigation measures.

I agree with PDP's assessment that, provided the proposed dust mitigation measures continue to be implemented consistently throughout the project, PM₁₀ concentrations will continue to be effectively controlled. As such, it is extremely unlikely that off-site PM₁₀ concentrations would reach a level at which adverse human health effects would be experienced. The proposed monitoring framework, including continuous particulate and meteorological monitoring, clear trigger levels, and adaptive management requirements, provides an appropriate level of assurance that any emerging risks can be identified and addressed early.

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Overall, from an air quality perspective, I consider the proposal to be acceptable. Subject to the proposed conditions and ongoing implementation of the Air Quality Management Plan, the air quality effects of the quarry expansion are expected to be no more than minor, and I support the application on this basis.

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3.0 Documents Reviewed

- Hunua Quarry - Air Quality Assessment (AQA), prepared by Pattle Delamore Partners Ltd, dated March 2026.
- Hunua Quarry Development – Assessment of Environmental Effects (AEE), prepared by Boffa Miskell Limited, dated March 2026.
- Hunua Quarry - Air Quality Management Plan (AQMP), prepared by Winstone Aggregates, dated March 2026.
- Hunua Quarry - Quarry Management Plan (QMP), prepared by Winstone Aggregates, dated March 2026.
- Hunua Quarry - Draft Resource Consent Conditions (FTAA), including Appendix B12.7 Conditions, dated 30 March 2026.
- Hunua Quarry - Annual Dust Monitoring Report (DIS60266230), prepared by Winstone Aggregates, covering the period 1 March 2024 - 28 February 2025, dated 17 March 2024.
- Hunua Quarry - Air Discharge Compliance Inspection Report (DIS60266230), Auckland Council, dated 25 September 2024.

4.0 Additional Reasons for Consent Not included in AEE

N/A

5.0 Specialist Assessment

1. Introduction

This specialist assessment relates to the application by Winstone Aggregates for the continued development and expansion of the Symonds Hill Pit at Hunua Quarry. The proposal seeks to enable ongoing quarrying activities, including associated earthworks, extraction, processing, and rehabilitation, over the consented quarry footprint.

In preparing this memo, I have reviewed the application in full and considered it alongside the relevant technical material, management plans, monitoring information, and draft consent conditions provided in support of the proposal. The assessment below focuses on the existing air quality environment, the potential air-quality effects arising from the proposed activities, the effectiveness of proposed mitigation measures, and the implications of the proposal within the applicable statutory framework.

2. Existing Environment

Hunua Quarry currently operates under an existing air discharge consent (DIS60266230), which regulates discharges of dust and requires ongoing ambient air quality and meteorological monitoring. Monitoring undertaken over an extended period demonstrates consistent compliance with the consented 24-hour average Total Suspended Particulate (TSP) limit of 100 $\mu\text{g}/\text{m}^3$. Recorded concentrations also remain below the Ministry for the Environment's good practice trigger value of 80 $\mu\text{g}/\text{m}^3$ for the vast majority of monitored days.

The most recent Annual Dust Monitoring Report, covering the period from 1 March 2024 to 28 February 2025, confirms that dust concentrations at all monitoring locations were well within consent limits, with no exceedances recorded. This compliance history is further supported by Auckland Council's air discharge compliance inspection dated 25 September 2024, which assigned the site an overall rating of fully compliant. No substantiated dust complaints were recorded during the most recent monitoring period. Collectively, this information indicates that the existing receiving environment is stable and that current dust management controls are functioning effectively.

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3. Potential Air Quality Effects

The Air Quality Assessment report by PDP (AQA) identifies fugitive dust as the primary air quality effect associated with the proposed continued development of the Symonds Hill Pit. Relevant particulate fractions include TSP, PM_{10} , and respirable crystalline silica (RCS), which may be generated through earthworks, overburden stripping, drilling and blasting, haul road traffic, stockpiling, and aggregate processing activities. These emission sources are typical of large-scale quarry operations.

Under conservative, unmitigated scenarios, coarse dust may travel short distances downwind during dry and windy conditions. Finer particulate fractions can disperse more widely, although concentrations reduce rapidly with distance from sources due to atmospheric dilution and deposition. The AQA identifies that surrounding sensitive land uses are sufficiently separated from primary dust generating areas to limit the potential for significant off-site effects. The proposal represents a continuation of an existing quarry operation, and no substantial change to baseline air quality conditions is anticipated when standard controls are applied.

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The greatest potential for dust effects is expected during periods of intensive earthworks and newly exposed surfaces, particularly during earlier phases of pit advancement. Any dust effects that arise are predicted to be temporary and localised in nature. The AQA indicates that predicted PM_{10} concentrations remain below the National Environmental Standards for Air Quality 24-hour threshold of 50 $\mu\text{g}/\text{m}^3$. RCS concentrations are assessed, using conservative assumptions, to remain below the widely applied annual average criterion of 3 $\mu\text{g}/\text{m}^3$. On this basis, air quality effects beyond the site boundary are anticipated to be less than minor.

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5. Proposed Mitigation Measures

Dust management for the proposed works is addressed through the Air Quality Management Plan (AQMP) and Quarry Management Plan (QMP), which build on measures already implemented at the quarry. These plans provide for active dust suppression using water carts and spray systems, operational speed controls on unsealed haul roads, regular inspection and maintenance of dust control infrastructure, and progressive stabilisation and rehabilitation of disturbed areas. Continuous ambient dust monitoring and on-site meteorological tracking support a responsive management approach, with defined trigger levels and contingency responses.

These measures reflect established industry practice for large quarry operations and are consistent with controls that have achieved a strong compliance record at the site to date. The draft consent conditions require certification, implementation, and periodic review of the AQMP, providing regulatory assurance around their ongoing effectiveness.

6. Regulatory Context

The proposal is consistent with the Auckland Unitary Plan (E14) provisions governing discharges to air, quarry activities, and effects management. Predicted particulate concentrations comply with the National Environmental Standards for Air Quality, and the assessment methodology applies the Ministry for the Environment's Good Practice Guide for Assessing and Managing Dust, including use of the FIDOL framework when considering nuisance effects. The draft conditions require ongoing monitoring, reporting, and adaptive management, ensuring that air quality effects remain appropriately controlled over time.

7. Conclusion

The information reviewed demonstrates that the existing air quality environment at Hunua Quarry is well characterised and supported by a long history of compliance with regulatory limits. Potential air quality effects associated with the continued development of the Symonds Hill Pit are primarily related to dust and are predictable, localised, and manageable. The proposed mitigation framework is comprehensive and proportionate to the scale of the activity, and it is supported by enforceable consent conditions. Provided that the certified AQMP is implemented as proposed, the air discharge effects of the project are expected to remain minor and acceptable under the relevant statutory framework.

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I have identified that there are no section 67 information gaps.

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7.0 Recommendation

In view of the above assessment, I support the application.

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8.0 Proposed Conditions

The proposed air quality-related consent conditions are appropriate to mitigate air discharge effects associated with the project. They are consistent with the measures contained in the applicant's existing air discharge consent and reflect good practice for managing dust and particulate emissions from quarrying activities. The table below sets out the relevant air-quality-related conditions together with brief comments on their suitability:

Condition theme	Consent #	Remarks
General accordance with approved information	1	Requires the project to be undertaken in general accordance with the lodged application material, which includes the Air Quality Assessment and supporting air quality appendices. This establishes the technical baseline for air quality effects assessment.
Management plan certification – Air Quality Management Plan	22–26, 46–47	Sets out the process for certification of the AQMP, including submission timeframes, certification by Council, and compliance with the certified plan once approved.
Air Quality Management Plan – Objective	46	Establishes the objective of the AQMP, being to minimise the risk of noxious, offensive, or objectionable dust or odour beyond the site boundary and to ensure compliance with air discharge limits and performance standards.
Air Quality Management Plan – Content requirements	47	Specifies the required content of the AQMP, including identification of dust sources, mitigation measures, monitoring locations, trigger levels, inspection and maintenance procedures, contingency responses, and calibration of equipment.
Compliance with air quality limits	132–135	Requires all site activities to be operated so that air emissions are maintained at the minimum practicable level and do not result in dust, odour, or hazardous air pollutants beyond the site boundary that are noxious, offensive, or objectionable.

Dust suppression and operational controls	136–148	Requires water suppression, dust minimising earthworks and blasting techniques, maintenance of dust control equipment, appropriate management of stockpiles and internal roads, wheel wash provision, and prohibition of open burning on site.
Dust complaints and investigation	138–140	Provides a framework for responding to dust complaints linked to blasting, including provision of blast and monitoring data to Council and investigation of further suppression measures if repeated non-compliance occurs.
Ambient dust monitoring – TSP	149	Requires continuous Total Suspended Particulate (TSP) monitoring at specified locations, using approved equipment connected to telemetry with real-time alert capability.
TSP concentration triggers and response	150–151	Sets 24-hour average TSP trigger levels at monitoring sites and requires investigation and remedial action if exceedances are identified as originating from site activities.
Reporting of dust monitoring results	152, 156–157	Requires prompt reporting of exceedances, quarterly summaries of dust related operational data, retention of monitoring records, and inclusion of results in the Annual Monitoring Report.
Meteorological monitoring	153	Requires installation, operation, and maintenance of a weather station to record wind speed, wind direction, and rainfall to support interpretation of dust monitoring data.
Respirable Crystalline Silica (RCS) monitoring	154–155	Requires an ambient RCS monitoring programme to assess compliance with an annual average criterion, including baseline and post-construction monitoring and continuation where exceedances are identified.
Annual Monitoring Report	64–66	Requires annual reporting to Council summarising all air quality monitoring, complaints, non-compliances, and corrective actions associated with the project.
Review of consent conditions	67	Enables Council to review conditions if unforeseen air-quality effects arise or if monitoring indicates the need for additional controls.

9.0 Supporting Documents

N/A

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name: Hunua Quarry Development Substantive Application

Fast-Track application number: FTAA-2603-1185

Council application numbers: BUN60464053 (LUS60464055 & LUC60464054)

2.0 Technical Specialist Memo – Earthworks & Erosion and Sediment Control

To: Emma Chandler, Consultant Planner
Warwick Pascoe – Principal Project Lead

From: **Andrew Rossaak** - Freshwater and terrestrial ecology (for Earth Streams & Trees and Ecological Advice teams)

Qualifications & Relevant Experience:

I hold the qualification(s) of: Masters of Science in Ecology and have 30 years of experience in preparing and reviewing environmental and ecological assessments. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirements, and have appeared as an expert witness before consent authorities on multiple occasions.

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (Code) and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

I attended a site visit in January 2026, although the location where the proposed ecological impacts would occur were not able to be accessed.

Preparation in Accordance with the Code of Conduct:

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Signature:



Andrew Rossaak

Date:

29 July 2026

3.0 Executive Summary

I consider that there are risks in achieving the required outcomes of the stream diversion. In this regard, I recommend that there is either an adaptive management mechanism in the consent conditions to increase offset should it not achieve and maintain the values (or potential) of the impact stream, or the stream offset is increased to account for this potential shortfall now.

The offered offset and compensation has demonstrated shortfalls and lacks the detail required to provide confidence in its calculated extent. For example, the offset streams for the SEV – ECR have no width indicated and no assessments, so stream offset is limited to simply riparian planting extent with little regard to the stream ecological value.

The resolution of a partial fish passage barrier as compensation for the loss of stream extent is considered an unusual approach. Removal of artificial barriers, like perched culverts, are not generally considered compensation as they should have been maintained to provide for fish passage under the Freshwater Fisheries act. The resolution of 1 barrier for the loss of 1 km of extent is not evaluated in the application (that the positive effects outweigh the adverse effects) and is considered insufficient without further evidence.

I do not accept that the offset and compensation package as presented demonstrates no net loss of freshwater values or net gain in terrestrial indigenous biodiversity.

My recommendation is that the residual effects are not adequately managed on the information before the Panel. I have recommend amendments to the conditions and these are provided separately.

4.0 Documents Reviewed

This assessment is limited to terrestrial and freshwater ecological aspects of the application. I have reviewed application documents relating to the site ecology and where I have been pointed by the applicant to relevant information such as in the groundwater assessment reports.

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

The applicant has identified the reasons for consent relating to chapters E3 and E15 of the Auckland Unitary Plan (AUP), and the National Environmental Standards for Freshwater (NES-F). I concur with those reasons for consent.

6.0 Specialist Assessment

The greatest adverse effects are: The reclamation of watercourses (streams and wetlands) and the removal of native forest (scheduled as a Significant Ecological Area). Ecological effects management for terrestrial and freshwater have been provided through avoidance, mitigation (through fauna management plans) as well as biodiversity offsetting and compensation.

Information has been provided following reviews and meetings with the applicant ecologists. Whilst many aspects have been addressed, there are aspects that remain unresolved.

The Project is bundled and assessed overall as a non-complying activity. The non-complying status derives from two ecological triggers — E3.4.1(A19), stream diversion within the SEA and ONL overlays, and E3.4.1(A49), new reclamation or drainage within those overlays. The other triggers are controlled, restricted discretionary or discretionary.

I have not undertaken a review against the Waikato Regional Planning documents and the applicant has not provided this for the proposed wetland and streamworks at Meremere. I am advised that the proposed activities are permitted in the Waikato are permitted activities.

6.1 Site overview of ecological values

Hunua Quarry is located on the western slopes of the Hunua Ranges, within a mosaic of remnant forest areas. Several Significant Ecological Areas (SEAs) are scheduled in the Auckland Unitary Plan (AUP) in the vicinity, including SEA_T_5323 which surrounds the existing Symonds Hill Pit and into which the expansion is proposed. In addition, covenanted planting areas also exist in the proposed expansion areas (fig. 25 in the EclA).

6.1.1 Terrestrial fauna and flora values

The values for the impacted terrestrial vegetation have been assessed using standard RECCE plots and PCQ (Point-Centred Quarter) methods. The high ecological value forest provides habitat for birds, bats and lizards and these have been drawn from previous surveys and field assessments using standard techniques.

The surveys have identified 14 threatened or at-risk plant species in the project area.

The valuation of the terrestrial values surrounding the quarry and of the impact areas of the proposed expansion are accepted.

6.1.2 Freshwater values

Wetlands have been delineated using the wetland delineation protocols (Ministry for the Environment). Field assessment was undertaken in mid-summer and based on the number and location of the vegetation assessment plots, the rapid technique was primarily used and supported by evidence of plots in the wetlands. Some areas that were less accessible (eg. 270 m of the Mangapū Stream reach was deemed too steep to access) have wetland extents estimated or were identified using aerial imagery. The methods used may result in an under assessment of wetland extent, although this may depend on the season and year of the aerial imagery used for delineation. Nevertheless, at the scale provided, I consider the wetland extent and values assessed acceptable, although this uncertainty would need to be refined should any future management plans require more detailed assessments. Nine wetlands were delineated with a total of 0.44 ha mapped. Seven of these are considered to currently have high ecological values (fig 27 of EclA).

0.002

Streams have been assessed using the Stream Ecological Valuation (SEV) method. Three sites were assessed for this application and past assessments from 2021 were also relied upon. The SEVs for Mangapū Tributary and mainstem were within the expected range for native forested stream (0.89 and 0.91). Industry standard surveys using eDNA and MCI data is provided for these sites.

MCI scores from 2010 to 2020 for two sites are presented, however, the value of 6 year old data is considered limited as both sites showed a decline in MCI from excellent (143) to the middle of the 'good' range (110) (figure 30 in EclA). The monitoring was undertaken for quarry sediment discharges.

0.003

The headwater in the vicinity and to the west of Middleton Road were assessed with one SEV being located here. The streams are reported to be mostly confined to gullies running generally north to south through the SEA_T_5323. Most headwater watercourses were classified as ephemeral, with some intermittent reaches also identified, although this was based on Geomaps rather than field assessments. The applicant has assessed that the proposed works will not adversely affect the ecology, functionality, connectivity or fish passage of the Mangapū Tributary headwaters. I accept this assessment and have not assessed these headwaters further. I note that the land use approvals sought run in perpetuity while the associated water permits and streamworks consents are limited to 35 years, and recommend the Panel satisfy itself that the approvals granted do not authorise works that would in practice adversely affect the headwater streams before that later application is lodged.

0.004

I have reviewed the applicant's response regarding the offsets established under the 2009 Symonds Hill Pit consent and the proposed relocation of the 'covenanted areas', and whilst there is some complexity in this regard, I am satisfied that the ecological objectives of that consent are upheld.

0.005

6.2 Potential adverse effects

A total of 44.46 ha of terrestrial indigenous vegetation communities (native forest) will be cleared over the life of the proposed expansion, along with 4.15 ha of exotic vegetation. This amounts to 4.55% of the total of SEA_T_5323 area being lost.

The quarry expansion will result in the direct removal of 0.22 ha of wetland features, including 0.12 ha of ecologically significant forest seepage, and 0.1 ha of degraded exotic grass-dominated swamp.

527 m of intermittent and permanent stream length will be lost from tributaries 3 and 4, and a length of 1,200 m from the Mangapū Tributary, totaling 1,727 m (although these lengths are not consistent throughout the reporting eg. Table 19, table 37 and text). This includes culverts that will need to be installed on the haul road. The diversion is proposed and thus the extent of stream loss is 1,157 m.

6.3 Terrestrial effects management

The loss of habitat and vegetation is unavoidable in enabling the proposed activity.

6.3.1 Avoidance, mitigation and restoration

This is largely achieved through fauna management plans for birds, bats and lizards. These plans provide for survey and salvage. The application considers salvage of fauna avoidance of harm and relocation as mitigation with no residual effects. I would consider avoidance to include only the protection area for native nesting birds and ensuring bats are not present in trees prior to felling. All salvage efforts (eg. Lizards) and relocation is considered mitigation.

The management plans are, in general, accepted and subject to finalisation and certification by Council. In addition, Department of Conservation (DOC) are reviewing these in terms of the Wildlife Act.

6.3.2 Offset and compensation

The proposal includes a biodiversity offset of 44.5 ha of planting around the quarry site; 21 ha planting at Meremere quarry site and more than 20 ha planting in the Hunua Regional Park.

Compensation is proposed to be provided in the form of 16.3 ha of enhancement to existing native vegetation.

Formal protection of the offset area and compensation area (including within that extent the wetland offset and compensation) are proposed and discussed further below. This is limited to focus areas 1 (Hunua quarry) and 2 (Meremere) the Hunua Regional Park offset area is already protected.

The offset and compensation extents have been evaluated using the Biodiversity Offset Accounting Model (BOAM). I provide further comments on this below, particularly around the metrics used.

The applicant's BOAM calculates 96.7 ha of revegetation as the minimum required to offset the loss of 44.46 ha of indigenous vegetation. 85.62 ha offset is identified, leaving an acknowledged shortfall of 11.08 ha, proposed to be

addressed by compensation. I accept compensation is available for that purpose. I note, however, that the shortfall is derived using the five structural attributes discussed in 3.4.3 below; a model incorporating the omitted attributes would be more likely to increase than reduce the offset requirement, and therefore the shortfall would be greater.

0.007

The planting at Meremere does not meet the offsetting principles of the AUP, Appendix 8 (3) regarding proximity to the impact and effects management undertaken at this site I consider to strictly be compensation.

The proposed planting is predominantly of early succession forest species at focus areas 1 and 2, with limited infill and valley bottom with later succession forest species. This does not appear to be in the same proportion to the vegetation types lost, with the applicant relying on natural successional development. Fore example, Meremere's planting has no equivalent statement of the target ecosystem type, so the like-for-like case is asserted rather than demonstrated for Focus Area 2.

0.008

The application acknowledges the presence of threatened vegetation species (most regionally, not nationally threatened), however, there is no measures provided to address these. There is no pre-clearance survey to relocate threatened plant specimens, no salvage, no spore or cutting collection and no inclusion of any threatened species in the offset planting schedules.

0.009

6.4 Freshwater effects management

6.4.1 Avoidance, mitigation and restoration

An Erosion and Sediment Control Plan (ESCP) is proposed for all earth/streamworks.

Fish salvage is proposed for instream works and reclamation.

Provided management plans are *prepared and implemented in accordance* with best practice these *would* be considered appropriate to address fauna impacts and the potential for sediment discharges, noting the ESCP is assessed by Council's Consultant Specialist, Steve Bryant.

0.010

6.4.1.1 Augmented flows for dewatering effects

The quarry expansion is predicted to have a dewatering effect on streams. These effects range in pure volume (which the applicant has focused on) and in reduced flow % of MALF (which I consider more critical). The estimates for flow loss ranges from -10% (and increase) to 76%. A reduction in flow may cause a contraction of the water channel, reduced habitat, increased water temperature, reduced dissolved oxygen, and reduced foodscapes in the water column.

There has been no modelling of potential effects of the reduced flows, however, stream augmentation is proposed to maintain flows at the existing Mean Annual Low Flow (MALF) based on calculated, correlated and existing flow measurements. I consider this maintenance of MALF and above to be appropriate to maintaining stream habitat

0.011

extent, noting that flow reductions of 5% or more are generally outside of natural variability (as noted in the PDP groundwater effects report).

I have some concern regarding the water quality of the augmentation flows as these are likely to be pumped from sumps in the base of the pit and could well carry contaminants from the works, have low dissolved oxygen being groundwater sourced. I have recommended monitoring of the groundwater to address these issues.

0.012

6.4.1.2 Stream diversion

The stream diversion is a core part of this application. I also consider it to be the highest risk from an ecological effects assessment point of view in terms of certainty of achieving the proposed outcomes (maintenance of stream potential value), in being able to be realised (constructability) and in managing the potential effects of the construction. The resultant stream diversion is to be carved out of rock with a very steep battered bank on the True Left Bank (TLB) and a haul road and ultimately a drop off into the quarry on the True Right Bank (TRB). Instream features such as pools and riffles are proposed. Riparian areas are, for much of the length, to be between 1 m and 5 m in width established on a shallow soil layer overlaying the rock.

The applicant considered the diversion to replace a portion of the reclaimed stream and its tributaries. The applicant proposes that this diversion will maintain the ecological values of the impact stream and therefore it is only the length difference that is required to be addressed through effects management. I do not concur with this and consider that, whilst the intention may be to create a biodiverse channel, there is a very low likelihood that this will achieve the equivalent ecological values of the high quality stream that currently exists. The riparian filtration function and natural flow regime along its length will be absent as will the wide (>20m) mature woody riparian vegetation of the current stream. The riparian vegetation is unlikely to thrive under the new alignment to the extent of the current stream. In addition, the narrow riparian margins (<5 m) of the diversion will be subjected to edge effects that will make maintenance of them an ongoing requirement. The resulting outcome is that there will likely be an unaccounted loss of stream ecological value on the diversion stream.

0.013

The applicant has provided monitoring for the diversion and performance is currently measured against three metrics — RHA, sediment and MCI — set below the condition of the reach being reclaimed. Large woody debris, a critical structural component of these watercourses, is not provided for, and canopy planting is delayed. My recommendation to use the SEV (for which values for the impact stream are provided — 0.91 and 0.83) as an outcome target has not been accepted. Should consent be granted, monitoring using the SEV and with agreed values outcome as a condition (along with water quality) would enable adaptive management to be implemented through additional offset/compensation actions should the stream not reach targets of maintaining potential and value.

0.014

The ecological performance target proposed for the realigned channel is MCI Band C (from the NPS:FM attribute tables). The reach to be replaced records MCI 115 (Band B) and QMCI 6.81 (Band A) at Site 3. The applicant justifies

the lower target by reference to the range of MCI values across the catchment, including downstream reaches. I do not accept this. The relevant comparison is the reach being lost, not a catchment continuum. The applicant's position is that the realignment maintains the values of the impact stream; a target set one to two bands below the existing condition is inconsistent with that position and is, in my view, an indication that equivalence will not be achieved.

0.014

6.4.2 Freshwater Offset and compensation

Stream loss is offset and compensated through riparian planting of 600 m in the quarry area, 400 m at the Meremere quarry and riparian planting along 2.58 km of the Mangatawhiri Stream within Hunua Regional Park. Total stream restoration/riparian planting length is 3,580 m. No SEV has been undertaken at the Meremere and Mangatawhiri locations, however, desktop estimates are provided from proxy sites to inform the SEV – Ecological Compensation Ratio (ECR). An SEV was undertaken at the offset site for the Waipokapū tributary (482/484 Hunua Road), however, this is not used in the ECR calculations. The total area of stream of SEV value 0.39 (SEVi-P) required to be improved (excluding the diversion) to a score of 0.71 (SEVm-P) is calculated by the applicant to require an offset of 3,980 m², equating to approximately 4,500 m of stream length (2,602 m at 1.1 m mean width for the Mangapū Tributary residual, plus 1,898 m at 0.59 m for tributaries 3 and 4). The applicant states 3,938 m² is provided, along 3,580 m length of stream.

Therefore, there is a shortfall of about 1,000 m of stream length. There is also a shortfall is 42 m² in area, however, the offset length and area is calculated from proxies and therefore unverified.

0.455

The full 1,157 m of stream extent is permanently lost and is not offset. The applicant acknowledges that the creation of additional new stream length and channels is not a feasible option, a position I agree with. Extent lost is proposed to be addressed by compensation through fish passage reconnection to 2,500–4,000 m of currently inaccessible watercourse to climbers. Addressing artificial barriers is a requirement under the Freshwater Fisheries Act.

In stream classification, there is inherently a transitional area where the ephemeral channel becomes intermittent. This transitional area moves within from season to season depending on antecedent environmental conditions. The timings of the assessments is mostly outside of the Auckland Council's timing window for stream classification. The impact is that extent of stream classified as intermittent that is to be reclaimed may be underestimated and therefore insufficient offset and compensation is provided to address the loss.

0.015

The applicant's assessment of offset and compensation extents are desktop estimates. For example, the Mangatawhiri River offset includes weeding and planting, however, there is no verification of the extents available for restoration.

The planting at Meremere is alongside the existing quarry and is only in the headwaters of the watercourse. There is a modified channel of over 1,000 m with narrow, poor riparian cover and culverts beyond the property before the Whangamarino wetland is reached. The assertion that this is a critical stream connection that is being restored is ambitious.

0.016

Wetland offset is calculated through the use of the BOAM. A total of 0.22 ha wetland is likely to be lost with the expansion and another similar extent lost through drainage, being close to the pit wall. A total of 0.44 ha (the application provides different extents as the addition comes to 0.45 ha, however, this is not considered to be material) requires 2.4 ha offset restoration using the applicant's BOAM calculator. A total of 2.5 ha wetland extent is proposed for offset restoration across the three focus areas, however, as previously discussed, the restoration at Meremere would be more appropriately considered compensation.

0.017

The BOAM has again been used with aggregated sites and offset locations providing uncertainty in the offset calculation and this is discussed below.

6.4.3 Overall Offset and Compensation

A biodiversity offset, under the AUP appendix 8 and the NPS:FM criteria, requires no net loss in the biodiversity values be achieved. However, the NPS:IB is more restrictive and only provides for *net gain*. In further consideration, the effects management hierarchy is applied sequentially, with each setting a higher bar for achievement of the residual effect, therefore, NPS-IB Appendix 4 / NPS-FM Appendix 7 require compensation to have demonstrated positive effects that outweigh the adverse effects, which is a higher outcome standard than offsetting's "no net loss".

The applicant has used the BOAM for terrestrial vegetation and wetland offset calculations. This is an industry standard tool to use for this, however, the manner in which the applicant has applied this creates uncertainty in the output. These are:

- For the terrestrial vegetation, the offset sites are calculated as having 'zero' across the ecological attributes assessed, which is unlikely to be the case as even pasture grass would provide some value.
- No data is provided for offset focus areas 2 and 3.
- In both the terrestrial vegetation and wetland calculations, the applicant has used 5 attributes which more appropriately describe functions rather than biodiversity values. Some of these attributes are aggregated metrics. On request of the applicant, I provided a list of over 50 metrics that can be considered in a BOAM assessment for wetlands. The attributes provided to the applicant included, among others, hydrological integrity, hydric soil condition, canopy cover and browsing damage. Each is measurable, each is a component of the Clarkson WCI already relied on by the applicant, and each converts readily into the area × condition currency the BOAM requires. None of the applicant's attributes capture the water table depth or hydric soil structure on which the forest seepages were delineated. Further the low number of

0.018

attributes used and their aggregated nature are not considered to address key ecological components of the wetland's values and may lead to hidden losses

- All the wetland offset areas, across the three locations, were assessed as having identical values which could be subject to restoration.
- Only two of the impacted broad vegetation type offsets are calculated using the BOAM. There is a separate BOAM for late successional forest (Tawa-taraire forest with mature kanuka/Kauri, podocarp, broadleaf forest) and another for Early successional vegetation. Seven distinct vegetation types are impacted.
- Four of the five wetland attributes score systematically higher on the offset sites than on the impact sites for reasons of ecosystem type rather than ecological condition. Planted farm-pond wetlands and alluvial terraces can score strongly on indigenous wetland plant dominance, hydrological connection, hydraulic function and open-wetland habitat value. Forest seepages score ambiguously or low on all four, not because they are degraded but because they are a different type of wetland.

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I am uncertain if these factors in the applicant's application of the BOAM would greatly alter the calculated offset extent (and I acknowledge that complexity can create false precision), however, I do consider that amending these calculations would at least provide a more transparent and robust offset assessment.

The use of the Meremere site as an *offset* is not supported due to its lack of proximity to the impact site, it is therefore more appropriate to consider it as a *compensation* site. The site is surrounded on three sides by pine plantations and is at least 300 m from the Whangamarino wetland. The watercourse that flows to the Whangamarino has culverts under a road and in private land and there is no evidence provided that these are not also fish passage barriers. The stream on the compensation site, for the most part, runs alongside the open quarry operation, has narrow sparsely vegetated riparian areas that are not subject to any improvement. The result is potentially a restoration wetland and stream that is somewhat isolated (1 km) from the Whangamarino wetland, reducing potential outcomes and benefits below that considered by the applicant when considering this landscape scale.

0.008

The Meremere site is also within a Quarry Zone under the Waikato District Plan and is therefore land identified for quarry purposes. The applicant proposes to secure it by covenant and has indicated no quarrying is planned. In my view that does not fully address the long-term (in perpetuity) outcomes principle, particularly given that this application itself proposes to remove offset planting established under a 2009 consent.

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Suggested S67: The offset calculations, being the BOAM and SEV-ECR are updated with improved assessment attributes and receiving site values in BOAM and receiving site metrics for the SEV-ECR calculations to demonstrate no net loss and net gain.

The "net gain in net present biodiversity value" conclusion is untestable without the model. This is the key component of the claim in the whole vegetation and stream offset and is not easily addressed by a condition.

0.020

8.0 Recommendation

I do not accept that the offset and compensation package, as presented, demonstrates no net loss of freshwater values or net gain in terrestrial indigenous biodiversity.

In particular:

- The BOAM model has not been used in a robust manner and contains errors, impacting robustness and assurance of offset extent (terrestrial and wetland).
- The SEV/ECR method has not been applied appropriately. If consent is granted, it should be incorporated into stream diversion monitoring, to enable adaptive management and quantification of additional offset and compensation actions in a robust and transparent manner, if the monitoring identifies shortfalls.
- The SEV -ECR assessment is based on proxy receiving streams and the offset and compensation extents must be verified to ensure that the requirements of no net loss and net gain are achieved.
- The Offset and compensation offered for both terrestrial and freshwater have indicated shortfalls in the application and lacks the detail of how these will be resolved. The Meremere site is not appropriate for offset due to its lack of proximity to the impact site, and its zoning under the Waikato District Council as a Quarry Zone. Any effects management here must be considered as compensation. Assurance of protection in perpetuity is uncertain.
- The resolution of a partial fish passage barrier is not appropriate to address the loss of stream extent.
- Measures to address rare and threatened vegetation species must be provided.

I do not support the proposal as the residual adverse effects on vegetation, wetlands and streams are not fully addressed by the application as lodged, and on that basis I am not able to support the application in its present form.

My position is directed at the adequacy of the effects-management package, not at the Project in principle. The deficiencies identified are capable of resolution — through combination of further information under s 67 of the FTAA and through amendment of the proposed conditions.

Suggested S67: The offset calculations, being the BOAM and SEV-ECR are updated with improved assessment attributes and receiving site values in BOAM and receiving site metrics for the SEV-ECR calculations to demonstrate no net loss and net gain.

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Consent condition amendments to include details on targets, monitoring frequency and thresholds, adaptive management, certification and re-certification to ensure offsets and compensation envisaged is achieved in the timeframes offered.

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9.0 Proposed Conditions

This is an ongoing review and will be provided separately.

Conditions.

The comments below are based on and following the 24th July 2026 email response from the applicant on ecology and groundwater conditions. The proposed conditions, subject to the amendments recommend below, would be considered sufficient address the potential effects. This acceptance is influenced by the requirement for plans, on which many of the ecological conditions hinge, will still need to be certified by Council.

Remaining concern and comments on the conditions are:

Condition number	Applicant proposed condition	AC comment
General	Water quality monitoring	There are numerous water quality monitoring conditions (39, 44, 45, 116, 117, 179, 200). They appear to be related to the stream diversion, ESCP and augmentation water. The stream diversion monitoring is proposed to cease/stop on completion of the physical works. The ongoing water quality monitoring is therefore limited to the ESCP, WQMMP, Flow Augmentation Monitoring. Continuous monitoring is accomplished well in many large projects and it is uncertain why the applicant does not wish to implement it on this site. Continuous monitoring provides detail of attribute values over time, more so than a single point assessment. In addition, if telemetry is used, then alarms can be set enabling rapid responses to environmental impacts. It is my recommendation that water quality monitoring should, where possible, be through the use of continuous monitoring equipment.
45	The WQMMP must include: (a) A drawing showing the monitoring locations upstream and downstream of discharge points; (b) Details of the methodology for undertaking water quality monitoring; (c) The frequency of water quality monitoring; (d) The monitoring parameters to be tested, which must include turbidity (NTU), pH, and total suspended solids (mg/L); and (e) Details of the response actions to be implemented where downstream monitoring results indicate significant or sustained deviations in turbidity, pH, or TSS relative to upstream	Council has requested baseline monitoring to be included as reference as well as inclusion of Dissolved oxygen and temperature. The applicant is not supportive of these additions indicating that these are in the SRMP, however, the SRMP only applies to construction-phase monitoring and therefore this will be the remaining water quality monitoring outside of ESCP and augmentation. It is understood that this condition for water quality monitoring is only for sediment monitoring (although the ESCP has its own monitoring). I therefore recommend that long-term monitoring should be implemented

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	results that can be attributed to discharges from the site.	(through this condition or another), that is comprehensive monitoring of water quality within the areas of potential impact of the quarry. Monitoring, where possible should be in situ and with continuous logging systems, preferably IOT or telemetry functions.	0.457
63	The objective of the Stream Realignment Management Plan (SRMP) is to detail the process for the design, construction, and long-term establishment of the Mangapū Tributary re,alignment in a way that: a. as far as practicable, replicates the creates a channel form and functioning watercourse with characteristics of the restored reach upstream, and the natural stream downstream; and b. achieves no net loss of value or potential compared to the impacted reach and is demonstrated using the Stream Ecological Value (SEV) assessment or equivalent; and; c. incorporates riparian planting along the full extent of the realigned stream corridor, and revegetation on the quarried benches above using native species to enhance natural character and ecological function consistent with the certified Landscape Rehabilitation Strategy and Management Plan required by Condition 52; and d. supports a healthy, resilient, and culturally aligned freshwater ecosystem; and e. Ensures compliance with Conditions 106 – 108 and 121 - 124.	This condition is vague on the outcome of the diversion stream. This is a critical aspect of the offsets. The SEV method has been proposed to assess this, however the applicant rejects this as the <i>SEV has only one realistic lever and that is riparian planting which is already provided for.</i> The length and value of the diversion is removed from any offset required for the reclamation of the stream. In order for this to be valid, the diversion must be demonstrated to achieve the length it is reported at and also to retain the values of the impact stream. Whilst the applicant maintains that the riparian edge is planted, this is limited to widths of 1 to 5 m for much of the diversion reach. On the evidence provided, I consider it very high risk that the diversion will not achieve the ecological, hydrological and biodiversity values (existing and potential) of the impact stream and therefore a loss of value is likely. This has not been considered in the application. Performance targets are critical to demonstrate this. Failure to meet these will lead to adaptive management plans. The SEV is an appropriate method to evaluate the ecological value of the stream. The impact stream has an SEV score that can be used in this condition as a target. Proposed condition (b): achieves no net loss of value or potential compared to the impacted reach and the maintenance of vaue is demonstrated using the Stream Ecological Value (SEV) assessment or equivalent. The impact stream has an SEV of 0.91 and 0.83 and the diversion target is thus >0.83.	0.458
64	The SRMP must include the following: (a) stream realignment design	The conditions lack details of the success measures that are to be achieved in (i) (vi).	0.459

	objectives and principles; (b) a refined hydrological assessment, incorporating continuous flow gauging on the Mangapū Stream and Mangapū Tributary to inform the detailed design of the stream realignment (c) .. (d) .. (i) description of stream monitoring, including: (i) <u>existing baseline monitoring; and</u> (ii) <u>turbidity and sediment deposition monitoring measure that achieve compliance with the requirements of conditions XXXX-XXXX;</u> (iii) <u>water quality monitoring (including DO, temperature);</u> (iv) <u>ecological monitoring (eg MCI, eDNA);</u> (v) <u>frequency of monitoring;</u> (vi) timeframes and measures of success; (vii) <u>management actions to address any success measures not being met;</u>	It is recommended that the success measures/targets are included in the condition. The applicant has identified success measures lower than that of the impact stream and I do not concur with this approach. This does not align with their assessment of effects that states there will be no net loss of value from the realignment. (Appendix B12.4.5b, Section 10.1 (p.125)). This issue has been raised in discussions with the applicant. Proposed addition: (viii) The following are target measures of success. MCI ≥ Band B (NPS:FM attribute tables). Habitat Quality Score band ≥Good Deposited fine sediments (NOF Table 16) ≥ Band B	0.460 0.461
117	ESCP water quality monitoring	Upstream and downstream monitoring should be automated with threshold alarms that will allow timely responses to exceedance events. Analysis of samples by a lab within 1 week of collection does not permit the reactive response for an exceedance.	0.462

		Recommended addition: Upstream and downstream monitoring is to be by continuous monitoring for the duration of the quarry works	0.462
202	202. Following commencement of augmentation, the receiving environment must meet the following criteria: a. The water temperature of Symonds Stream and Hays Stream below the augmentation flow discharge point must be equal to or less than the water temperature above the discharge point; and b. The dissolved oxygen concentration below the discharge point must be equal to or greater than 6 milligrams per litre.; c. The pH concentration below the discharge point must be within one whole unit of upstream value; and d. The turbidity levels must not exceed a 20% change between upstream and downstream monitoring points.	The value of 6 mg/l for dissolved oxygen is considered to be low for this watercourse. The impact stream would have a value likely exceeding 9mg/l and the applicants choice of 6 mg/l is that it is survivable for freshwater fish. I consider augmentation water of this low DO value would impact the freshwater values of the stream. Recommended measure is to increase dissolved oxygen > 8mg per litre in part b of the condition.	0.463
Table 2	Offset and compensation	This table is limited to the extents of impact and offset and the applicant has agreed to update it with the implementation dates. This table must be updated (or an additional table developed) to set out the target ecological values to be achieved for each freshwater and terrestrial offset and compensation actions. This is critical as it relates to the loss in value and extent being considered. As outlined in my technical memo, there remains uncertainty that the offset and compensation offered demonstrates no net loss of freshwater values or net gain in terrestrial indigenous biodiversity. Recommended addition: Ecological value targets for each offset and compensations site and measuring methods.	0.464

Technical Specialist Memo – Contaminated land

To: Emma Chandler – Lead Planner & Warwick Pascoe - PPL

From: Simon Cocker. Registered Landscape Architect

Qualifications & Relevant Experience:

I hold the qualification(s) of: M.Phil Landscape Design from the University of Newcastle Upon Tyne, and have 35 years of experience in landscape architecture.
I am a Registered member of Tuia Pito Ora / New Zealand Institute of Landscape Architects. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, and notices of requirement for designation and have appeared as an expert witness before consent authorities and the Environment Court on multiple occasions.

Preparation in Accordance with the Code of Conduct:

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses, and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Date: 20 July 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name: Hunua Quarry

Fast-Track application number: FTAA-2603-1185 (Council Reference BUN60464053)

Site address: 489 Hunua Road, Hunua

2.0 Executive Summary / Principal Issues

The Landscape Effects Assessment acknowledges that the proposal will result in physical landscape effects which are assessed as high, and landscape character effects, assessed as moderate-high (adverse) during operation before mitigation. These will (respectively) reduce to moderate to moderate high (adverse), and moderate, at completion after mitigation. My understanding of the time scale in relation to the reduction in the level of adverse effect is 10 years after completion. Potentially, the land use consent will run for 80 years, and mitigation measures will only become effective in the latter stages (50 years +) of the activity. The elevated level of effect therefore will be present for some 40 - 50 years.

The same applies for:

1. localised effects on the Outstanding Natural Landscape (ONL) (moderate (adverse) during operation before mitigation, reducing to low-moderate (adverse) at completion after mitigation),
2. natural character effects (high adverse effects on natural character within the affected reach due to the loss of existing 'high to very high' natural character reducing over time to moderate (adverse) at the tributary scale), and
3. visual effects (which are predicted to be - for private properties located to the south and west of the Site, between neutral to moderate-high (adverse) during operation before mitigation, progressively reducing - for the worst affected - to Moderate as rehabilitation and mitigation planting matures on the upper quarry benches).

The longer term predicted levels of effect levels rely on the successful and continued implementation of a suite of mitigation / management tools which are set out in section 7 of the BML landscape effects assessment. These include the Mangapū Stream Tributary realignment, Native Revegetation and Landscape Rehabilitation and off-site mitigation planting. This latter mitigation tool will form a voluntary condition which has been developed to address moderate-high (adverse) visual effects on identified private properties within Viewing Groups (S1, S2, W1 and W2).

In particular, the assessment stresses that the extent to which the natural character values are ultimately restored depends heavily on the success of the realignment design and management, including channel geometry, stream function, hydrological performance, and the long-term establishment of indigenous vegetation (section 6.2).

Noting the importance of the long term focus required to ensure that the mitigation will be, and will continue to be, successful, I am of the opinion that the conclusions of the landscape effects assessment are reliable, and the level of effects predicted are accurate.

The magnitude of adverse effect is as may be expected for a project of this scale, and it is noted that the level of effect on a local scale for landscape, and natural character will remain (using RMA terminology) more than minor after mitigation.

The LEA opines however, that when considering the level of landscape, and natural character effect on a wider landscape / catchment scale, the final level of effect is determined to be (using RMA terminology) minor or less than minor after mitigation.

Visual effects are expected to remain (using RMA terminology) more than minor after mitigation for a limited number of individuals (refer to Table 13 in the landscape effects assessment). These properties are targeted for

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the off-site mitigation planting and with this mitigation planting it is stated that the level of effect will be Low-moderate adverse.

I have concerns regarding the Mangapū Tributary Realignment. My concerns are based on the fact that this is a complex project and reinstating the natural systems of the proposed realigned gully will be very challenging. BML recognise, and have signaled this in the Landscape effects assessment and I quoted from that document where they state that (mitigation) success 'depends heavily on the success of the realignment design and management, including channel geometry, stream function, hydrological performance, and the long-term establishment of indigenous vegetation (section 6.2)'. Success will require a relatively high input (and - I assume - cost) over a prolonged period and will require close ongoing monitoring. Section 6 of the technical document confirms this and states:

"As part of operating and maintaining the realigned stream channel, an operational maintenance plan will be prepared to align with the Stream Realignment Management Plan. The plan will detail key operational requirements such as routine inspections to inform maintenance needs along with flood response and associated repairs in order to maintain the design intent and mitigate adverse effects"

Preparation of this technical report has included input from a number of specialists. My review addresses matters which fall into the scope of my expertise and I anticipate that review from other specialists will be undertaken.

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3.0 Documents Reviewed

Part B: *Assessment of Environmental Effects and Application for Resource Consent – Hunua Quarry Development* (AEE) prepared by Boffa Miskell, dated 30 March 2026, and the following appendices specific to my area of expertise:

- Appendix A6.6 Indicative Construction Sequence and Programme_20260330
- Appendix B12.2b Location Plan Boffa Miskell Plans_20260330
- Appendix B12.3aa Plans of the Proposal_20260330
- Appendix B12.3ab Plans of the Proposal_20260330
- Appendix B12.3ac Plans of the Proposal_20260330
- Appendix B12.3ad Plans of the Proposal_20260330
- Appendix B12.3ae Plans of the Proposal_20260330
- Appendix B12.4.10a - Landscape Effects Assessment
- Appendix B12.4.10b - Landscape Effects Assessment Appendix 3 Visibility Visual Effects Table
- Appendix B12.4.10c & B12.4.10d - Landscape Effects Assessment Appendix 4 Graphic Supplement
- Appendix B12.8.9 - Landscape Rehabilitation Plan
- Memorandum dated 16 June 2026 prepared by BML (and supporting graphic supplement) addressing Landscape and Visual Effects of the Hunua Quarry Development as experienced from Pukekōi wiriki pa and Red Hill Scenic Reserve¹

¹ Assessment from this viewpoint was sought in the Cultural Values Assessment Addendum prepared by Te Ākitai Waiohū

Other:

- Appendix A6.7 Iwi Engagement Report_20260330
- Appendix B12.4.2 Archaeological Assessment Report_20260330
- Appendix B12.4.5a Ecological Effects Assessment_20260330
- Appendix B12.4.5b Ecological Effects Assessment_20260330
- Appendix B12.4.6a Mangapu Tributary Realignment - Preliminary Design and Effects Technical Report_20260330
- Appendix B12.4.6b Mangapu Tributary Realignment - Preliminary Design and Effects Technical Report_20260330
- Appendix B12.8.10 - Ecological Management Plan
- Appendix B12.4.13 - Stream Crossing Report
- Appendix B12.8.7 - Stream Realignment Management Plan

4.0 Additional Reasons for Consent Not included in AEE

There are no additional reasons for consent not included in the AEE

5.0 Specialist Assessment

Introduction

The AEE has detailed that the Fast-track resource consent application for the expansion of the Hunua Quarry Symonds Hill pit is to involve the expansion of the pit by approximately 50 hectares to a full pit extent of 100 hectares, to be progressed in eight indicative stages over 50–80 years.

Two site visits were undertaken, the first on 14 January 2026 to the site itself, and the second on 28 January 2026 when the site was observed from the wider landscape.

My review has been based on guidance provided in Te Tangi a te Manu / Aotearoa NZ Landscape Guidelines²

A peer reviewer will typically review the assessment report, make a site visit, and write a short report confirming (or not) that the assessment:

- *follows a sound methodology and method for the purpose*
- *considers the relevant statutory provisions and any relevant ‘other matters’*
- *accurately describes, interprets, and evaluates the relevant landscape and natural character and values*
- *analyses the effects on landscape and natural character values in a balanced and reasoned way*
- *reaches credible findings supported by reasons*
- *makes appropriate recommendations with respect to findings*

² *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines*, Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022

Methodology and method

The Landscape Effects Assessment (LEA) explains, in section 2.0, that it was undertaken with reference to the Te Tangi A Te Manu, and Quality Planning Landscape Guidance Note. Further it states that the assessment was undertaken from a Te Ao Pakeha world view using the terminology of Te Tangi a te Manu.

The LEA includes a ZTV analysis and visual simulations. The methodology for preparing the former is explained in section 2.1.5 and the LEA states that the visual simulations were prepared in accordance with NZILA Best Practice Guideline for Visual Simulations

The assessment includes a methodology and outline of the effects ratings used in Appendix 1.

I am of the opinion that an appropriate methodology has been adopted and executed in the preparation of the LEA.

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Statutory provisions and any relevant 'other matters'

The relevant statutory matters are identified and discussed in section 5.0 of the LEA. It references the FTAA, the key matters contained in the RMA (1991). With regard to the Auckland Unitary Plan, it explains that a majority of the Site is located within the Special Purpose - Quarry Zone with a small portion extending into the Mixed Rural Zone to the east and south. Some 6ha of the quarry development area extends into the eastern edge of the overall 394ha Ponga Road ONL (ID 60) whilst the quarry development area is also subject to a Significant Ecological Area overlay (SEA_T_5323).

In section 6.5, the LEA states that, from a landscape perspective, the quarry development area is generally consistent with the intent of H19. It explains that the proposal will occur within, and remains legible as part of, a working rural landscape. It opines that the amenity effects will be addressed through containment, staging and mitigation.

In relation to D10, the quarry development will result in localised adverse effects on ONL values, but that these effects will be spatially contained, will occur adjacent to an existing quarry modification, and will be mitigated through a rehabilitation and revegetation programme

It concludes that the Project is not considered inappropriate at the broader landscape scale because the adverse effects have been adequately managed. Provided that mitigation and progressive rehabilitation are implemented as proposed, these measures will continue to maintain the visual coherence and physical integrity of the ONL.

Noting my comments with regard to reliance on mitigation measures (detailed below), I concur with the conclusions above.

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Description and interpretation of landscape and natural character and values

The existing landscape is described in section 4.0 of the LEA, with the broader landscape context characterised in section 4.1 and the local context in sections 4.2 and 4.3. I am of the opinion that these sections provide a detailed understanding of the existing landscape and receiving environment.

Landscape values are evaluated in section 4.5. The wider values of the ONL (ID60) are summarised in Table 3, and the site scale values of the ONL helpfully summarised in Table 4. In this section, the LEA also references the Te Ao Māori perspective as provided by Ngāti Tamaoho (Appendix A6.7 Iwi Engagement Report).

Natural character values are evaluated in section 4.6., and this section references the BML ecological report (Appendix B12.4.5a and b - Ecological Effects Assessment).

Based on my review which is undertaken from the perspective of my area of expertise, I am of the opinion that the information provided in these sections is detailed and thorough.

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The visual catchment of the quarry development area is described in section 4.7. Based on a site visit with the applicant's landscape architects, and the information provided in the LEA (including the ZTV analysis), I am of the opinion that the identified catchment is accurate.

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Effects on landscape and natural character values

The LEA explains that the effects considered include those that can occur in relation to changes to landscape attributes and values, character and visual amenity and confirms that the effects described are considered with the proposed mitigation measures implemented.

It states that in relation to this Project the degree to which landscape and visual effects are generated by a development depends on a number of factors, which include:

- The degree to which the Project contrasts, or is consistent, with the qualities of the surrounding landscape.
- The proportion of the Project that is visible, determined by the observer's position relative to the objects viewed.
- The distance and foreground context within which the Project is viewed.
- The area or extent of visual catchment from which the Project is visible.
- The number of viewers, their location and situation (static or moving) in relation to the view.
- The backdrop and context within which the Project is viewed.
- The predictable and likely known future character of the locality.
- The anticipated outcomes sought in the statutory provisions, including zoning.
- The quality of the resultant landscape, its aesthetic values and contribution to the wider landscape character to the area

I consider this approach and understanding to be appropriate.

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In section 6.0, the LEA explains that the particular effects considered relate to the following:

- Landscape effects (inclusive of landscape character and values, including on the ONL);
- Natural Character effects;
- Visual amenity effects from public and private locations (including residences); and
- Cumulative effects

Physical landscape effects.

The LEA determines that the physical landscape effects at the local level are considered to be **high** (adverse)³ during operation (before mitigation) and reduce to **moderate to moderate-high** (adverse) at completion after mitigation (after 10 years). The rationale provided for this is credible, noting the removal of ridges and hillslopes within the ONL, realignment of the Mangapū Stream tributary and the loss of 44.46ha of indigenous vegetation (most of which is in areas of SEAs), including 6ha located within the ONL.

At the broader scale of the hill country landscape, the physical changes occur in the context of the established and long standing Hunua Quarry operation, and the LEA assesses the change in the physical landscape effects as being **low** (adverse), decreasing to **very low** (adverse) at completion (after mitigation). I concur with this determination.

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The LEA describes how, across the offset sites, opportunities for native revegetation have been identified, and that once established, and when combined with the physical effects of the Project, these plantings will result in **low-moderate** (adverse) residual physical effects. I concur with this determination however, I note that my understanding of the time scale in relation to the reduction in the level of adverse effect is 10 years after completion. Potentially, the land use consent will run for 80 years, and mitigation measures will only become effective in the latter stages (50 years +) of the activity. The elevated level of effect therefore will be present for some 40 - 50 years.

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Landscape character effects.

In section 6.1.2, the LEA opines that the landscape character effects at the Site and immediate surrounds level will be **moderate-high** (adverse) during operation (before mitigation), reducing to **moderate** (adverse) at completion after mitigation has become established.

At the broader landscape character scale of the Ararimu Greywacke Dominant Hill Country, it opines that the level of effect will be **low** (adverse) during operation (before mitigation), reducing to **very low** (adverse) at completion after mitigation has become established. This is due to the moderation offered by distance as well as intervening topography and vegetation.

The memorandum dated 16 June 2026 assesses the landscape effects of the Project as experienced from Pukekōiwiriki pā to be **low-moderate** (adverse), reducing to **low** (adverse) over time and as the rehabilitation planting establishes to re-green the quarried cut faces outside of the quarry zone.

I concur with the above determinations.

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Effects on the landscape values of the ONL.

In section 6.1.3, the LEA determines that the adverse effects on the landscape values of the Site ONL are assessed as **moderate** (adverse) during operation (before mitigation) and **low-moderate** (adverse) at completion (after mitigation).

³ I note that the 'significance of effects' is explained in Appendix 2 of the LEA, with a 'high' and 'very high' level of effect being identified as 'significant'

It states that at the broader hill country landscape scale, effects on the landscape values of the ONL will be more contained, as the elevated forested ridges, upper slopes, and wider natural landform sequence remain largely unaffected. As such, it states that the adverse effects on landscape values of the broader ONL are considered to be **low-moderate** (adverse) during operation (before mitigation), reducing to **low** (adverse) at completion (after mitigation).

Turning to RMA s6(b), *the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development*, the LEA concludes that the Project will result in **moderate** (adverse) effects on the Site ONL.

Table 7, in section 6.1.4 usefully summarizes the anticipated levels of effect in tabular form. Unlike Table 8 which summarizes the natural character effect, Table 7 does not provide indicative time scales for the reduction in the level of adverse effect. Inclusion of this information in Table 8 would be helpful to understand the duration of the elevated levels of adverse effects. Similarly, this information would also be of assistance in the tables which summarize the visual effects in section 6.3.1 and in Appendix 3 of the LEA.

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I am of the opinion that the rationale provided for the above determinations is credible and I concur with these conclusions.

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Natural character effects.

In section 6.2 of the LEA, the immediate effects of the lower reach of the Mangapū Stream tributary realignment are assessed as **high** (significant) adverse at the tributary scale. It states that the level of adverse effect will gradually reduce to moderate-high (adverse) over some 10-20 years as natural character is restored and finally resulting in long-term **moderate** (adverse effects), after some 20-50 years. Notably, the commentary states that “...the extent to which the natural character values are ultimately restored depends heavily on the success of the realignment design and management, including channel geometry, stream function, hydrological performance, and the long-term establishment of indigenous vegetation.”

The LEA opines that once rehabilitated, the level of natural character of the Mangapū Stream system is considered to remain **moderate-high** overall and result in **very low** (adverse) level of effects.

As described above, with regard to RMA s6(a), *the preservation of the natural character of lakes and rivers and their margins, and their protection from inappropriate subdivision, use, and development*, the LEA states that proposed removal of a 1,200m section of the lower reach of the Mangapū Stream tributary and its replacement with an approximate 570m long new engineered, meandering channel will initially result in **high** (significant) adverse effects at the tributary scale, with a reduced level of effects at the wider Mangapū Stream catchment scales.

Table 8, usefully summarizes the anticipated levels of natural character effect in tabular form.

Whilst noting the lengthy period over which the level of adverse effect will remain ‘significant’ (up to 10 years), I am of the opinion that the rationale provided for the above determinations is credible and I concur with these conclusions.

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Visual effects.

Visual effects are addressed in some detail in section 6.3. The section concludes that visual effects (which are predicted to be - for private properties located to the south and west of the Site, between **neutral** to **moderate-high** (adverse) during operation before mitigation, progressively reducing – for the worst effected – to **Moderate** as rehabilitation and mitigation planting matures on the upper quarry benches).

Appendix B12.4.10b provides a detailed distillation of the potentially affected receptors and level of adverse effect.

For other public and private locations, the level of effect is predicted to be Low-Moderate (adverse) at most.

The memorandum dated 16 June 2026 assesses the visual effects of the Project as experienced from Pukekōiuriki pā to be **low-moderate** (adverse), reducing to **low** (adverse) over time, as the rehabilitation planting establishes to re-green the quarried cut faces. It assesses the visual effects of the Project as experienced from Red Hill Reserve are considered to be **very low** (adverse), due to the nature of the view and existing Hunua Quarry operations being an existing element in the landscape.

I am of the opinion that the rationale provided for the above determinations is credible and I concur with these conclusions.

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Section 7 of the 'Appendix 6. Landscape Rehabilitation Strategy and Management Plan' sets out the Offsite visual mitigation planting methodology, stating that such planting is a voluntary condition, developed to address moderate-high (adverse) visual effects (Viewing Groups (S1, S2, W1 and W2)). It explains:

"This methodology sets out an indicative step-by-step process for offering, designing, implementing, and establishing voluntary visual mitigation planting on private properties where owners elect to participate."

This offsite planting appears to differ from the Area C mitigation planting (as shown on the Phase 1 Symonds Hill Pit Rehabilitation Plan - p25 of the above document). Area C is undertaken within the holding and is implemented under phase 1 (0-5 years of the project).

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I am of the opinion that this is a practical solution to the elevated effects identified, but that the assessment of visual effects doesn't consider this mitigation in its assessment of the properties in question.

Comment on landscape, natural character and visual effects.

In stating my agreement with the predicted levels of temporary and long term effect, I note that the longer term predicted levels of (landscape, and also natural character and visual) effect rely on the successful and continued implementation on a suite of mitigation / management tools which are set out in section 7 of the BML landscape effects assessment. These include the Mangapū Stream Tributary realignment , Native Revegetation and Landscape Rehabilitation and off-site mitigation planting. This latter mitigation tool, which will form a voluntary condition, has been developed to address moderate-high (adverse) visual effects on identified private properties within Viewing Groups (S1, S2, W1 and W2).

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In particular, the assessment stresses that the extent to which the natural character values are ultimately restored depends heavily on the success of the realignment design and management, including channel

geometry, stream function, hydrological performance, and the long-term establishment of indigenous vegetation (section 6.2). With reference to natural character, the LEA states that success will be secured through condition of consent however, I have concerns that the conditions of consent relating to mitigation and rehabilitation appear to limit maintenance to a period of 5 years.

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In particular, I have concerns regarding the Mangapū Tributary Realignment. My concerns are based on the fact that this is a complex project and reinstating the natural systems of the proposed realigned gully will be very challenging. BML recognise, and have signaled this in the Landscape effects assessment and I quoted from that document where they state that (mitigation) success 'depends heavily on the success of the realignment design and management, including channel geometry, stream function, hydrological performance, and the long-term establishment of indigenous vegetation (section 6.2)'. Success will require a relatively high input (and - I assume - cost) over a prolonged period and will require close ongoing monitoring. Section 6 of the technical document confirms this and states:

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"As part of operating and maintaining the realigned stream channel, an operational maintenance plan will be prepared to align with the Stream Realignment Management Plan. The plan will detail key operational requirements such as routine inspections to inform maintenance needs along with flood response and associated repairs in order to maintain the design intent and mitigate adverse effects"

Based on discussions with the applicant to date, it is understood that this is not the intent, and that maintenance is intended to occur until certain health and sustainability outcomes are achieved, with 5 years being a minimum maintenance period only. Determining whether this is an appropriate response which will achieve the outcomes sought is better addressed by the ecological specialist. My understanding is that the ecological specialist has provided amendments to conditions to deliver this and these are recommended below.

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Preparation of this technical report has included input from a number of specialists. My review addresses matters which fall into the scope of my expertise and I anticipate that review from other specialists will be undertaken.

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Whilst noting my concern regarding the importance of the long term management required to ensure that the mitigation will be, and will continue to be, successful, I am of the opinion that the conclusions of the landscape effects assessment are reliable, and the level of effects predicted are accurate.

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The magnitude of adverse effect is as may be expected for a project of this scale, and it is noted that the level of effect on a local scale for landscape, and natural character will remain (using RMA terminology) more than minor (but not significant within the FTAA context), after mitigation.

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Cumulative effects

The LEA states, in section 6.4, that the Hunua and Drury Quarries are part of the same wider rural setting, but they are separated by intervening hill ridges, dissected topography, and extensive areas of indigenous vegetation.

As a result these landform and vegetation patterns effectively prevent simultaneous visibility of both quarries from any single public or private viewpoint within the surrounding district and so the quarries are neither experienced together within the same view, nor do they cumulatively alter skyline profiles or landscape patterns when observed from common vantage points. It asserts that these factors will ensure that the existing and proposed quarries do not give rise to more than low cumulative landscape effects.

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I concur with this opinion.

6.0 Section 67 Information Gap

There are no substantive information gaps.

7.0 Recommendation

My review has concluded that the methodology employed in the LEA is appropriate, the information provided is detailed, the characterisation and evaluation of the landscape accurate and the assessment of effects is accurate.

The LEA acknowledges that the proposal will result in physical landscape effects which are assessed as high, and landscape character effects, assessed as moderate-high (adverse) during operation before mitigation. These will (respectively) reduce to moderate to moderate high (adverse), and moderate, at completion after mitigation. My understanding of the time scale in relation to the reduction in the level of adverse effect is 10 years after completion.

Potentially, the land use consent will run for 80 years, and mitigation measures will only become effective in the latter stages (50 years +) of the activity. The elevated level of effect therefore will be present for some 40 - 50 years. Unlike Table 8 in the LEA which summarizes the natural character effect, Table 7 does not provide indicative time scales for the reduction in the level of adverse effect. Inclusion of this information in Table 8 would be helpful to understand the duration of the elevated levels of adverse effects. Similarly, this information would also be of assistance in the tables which summarize the visual effects in section 6.3.1 and in Appendix 3 of the LEA.

The same (in terms of timescale and duration of adverse effect) applies for:

1. localised effects on the ONL (moderate (adverse) during operation before mitigation, reducing to low–moderate (adverse) at completion after mitigation),
2. natural character effects (high adverse effects on natural character within the affected reach due to the loss of existing ‘high to very high’ natural character reducing over time to moderate (adverse) at the tributary scale), and
3. visual effects (which are predicted to be - for private properties located to the south and west of the Site, between neutral to moderate-high (adverse) during operation before mitigation, progressively reducing - for the worst affected - to Moderate as rehabilitation and mitigation planting matures on the upper quarry benches).

The longer term predicted levels of effect rely on the successful and continued implementation on a suite of mitigation / management tools which are set out in section 7 of the BML landscape effects assessment. These include the Mangapū Stream Tributary realignment , Native Revegetation and Landscape Rehabilitation and off-site mitigation planting.

In particular, the assessment stresses that the extent to which the natural character values are ultimately restored depends heavily on the success of the realignment design and management, including channel

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geometry, stream function, hydrological performance, and the long-term establishment of indigenous vegetation (section 6.2).

In my review I have identified this reliance on long term and complex mitigation as a risk, however this opinion is based on my area of expertise and should be considered in the light of other specialist reviews.

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8.0 Proposed Conditions

I have reviewed the proposed draft conditions provided by the applicant. For ease of cross referencing, I have reproduced relevant ecological conditions below and have included comments where relevant.

Land-use Condition		Review comments/recommendations
55	Landscape Rehabilitation Strategy and Management Plan The objective of the Landscape Rehabilitation Strategy and Management Plan (LRSMP) is to detail the process for the progressive rehabilitation of the Site to mitigate the landscape, natural character, and visual effects of the Project, and to ensure compliance with Conditions 111 - 123.	Note: condition 25 requires submission to AC 20 working days prior to commencement of Construction works
56	The LRSMP must include: (a) landscape mitigation objective and design principles; (b) a description of the landscape context and values of the Site to be addressed by the LRSMP; (c) a description of the factors influencing landscape rehabilitation of the Site; (d) landscape rehabilitation strategy including rehabilitation plans showing the phased rehabilitation of the Site as each stage of mineral extraction is completed; (e) a description of the rehabilitation process, including landform modification, drainage, soil preparation, revegetation, natural regeneration, and weed management; (f) the approach to implementing planting, including responsibilities, timing, plant species and source. (g) framework for developing and implementing Detailed Landscape Design and Planting Plans for progressive rehabilitation of the quarry faces and slopes and OBDA areas; (h) timeframes for the implementation of Detailed Landscape Design and Planting Plans;	I question whether 5 years maintenance is sufficient from a project of this scale and risk. I would suggest amendments to this condition (56(i)) to align with the recommended wording of maintenance for Condition 131 below.

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	(i) a description of how maintenance of planting areas for five (5) years after planting, including replacement of plants that do not survive, will be undertaken. (j) a description of how landscape management actions will be monitored, including timeframes, and measures of success; (k) provision for reporting on the performance of the landscape rehabilitation works undertaken through the Annual Report required by Condition 64; and (l) a process for review of the LRSMP to adapt to any changes in the receiving environment	
59	The objective of the Ecological Management Plan (EcMP) is to detail the process for developing ecological offset and compensation sites, and undertaking revegetation and enhancement planting for the Project to achieve no net loss of indigenous biodiversity, and ensure compliance with Conditions 128 – 129	-
60	The EcMP must include: (a) a description of the terrestrial and freshwater ecology and biodiversity values to be addressed by the EcMP; (b) plans identifying the locations of all offset and compensation areas; (c) a description of the approach to developing all offset and compensation areas, including staging of planting; (d) best practice actions to: (i) minimise the loss of ecological values prior to and during vegetation removal; (ii) minimise the loss of ecological values prior to watercourse and wetland works; and (iii) manage adverse edge effects on adjoining existing vegetation; (e) a description of the indicative source, species mix, size, spacing, density, and layout, of plants and planting methods to be used at each offset and compensation area;	I question whether 5 years maintenance is sufficient from a project of this scale and risk. I would suggest amendments to this condition as follows: (i) a description of how maintenance of planting areas, including replacement of plants that do not survive, will be undertaken and which as a minimum requires maintenance to continue: (i) for at least five (5) years, or and until 80% canopy closure is achieved (whichever occurs first); and (ii) until a plant survival rate of at least 90% of the original planting density has been achieved;

	(f) a framework for developing and implementing Site Specific Planting Plans on a staged basis at each offset and compensation area and the process for preparing and approving these plans prior to works commencing; (g) a description of how all planting will be protected from stock; (h) timeframes for the implementation of Site Specific Planting Plans; (i) a description of how maintenance of planting areas, including replacement of plants that do not survive, will be undertaken and which as a minimum requires maintenance to continue: (i) for at least five (5) years, or until 80% canopy closure is achieved (whichever occurs first); and (ii) until a plant survival rate of at least 90% of the original planting density has been achieved; (j) a description of how ecological management actions will be monitored, including timeframes, and measures of success; (k) procedures for reporting on the performance of planting through the Annual Report required by Condition 64; (l) methods to ensure integration with the following associated management plans: (i) Landscape Rehabilitation Strategy and Management Plan; (ii) Stream Realignment Management Plan; (iii) Aquatic Fauna Salvage and Relocation Plan; (iv) Lizard Management Plan; and (v) Pest Management Plan; and (m) a process for review of the EcMP to adapt to any changes in the receiving environment.	
67	Stream Realignment Management Plan The objective of the Stream Realignment Management Plan (SRMP) is to detail the process for	-

	the design, Construction, and long-term establishment of the Mangapū Tributary realignment in a way that: (a) as far as practicable, replicate the channel form and function of the restored reach upstream, and the natural stream downstream; and (b) incorporates riparian planting along the full extent of the realigned stream corridor, and revegetation on the quarried benches above using native species to enhance natural character and ecological function consistent with the certified Landscape Rehabilitation Strategy and Management Plan required by Condition 55; (c) supports a healthy, resilient, and culturally aligned freshwater ecosystem; and. (d) Ensures compliance with Conditions 96 – 98 and 111 - 114	
68	The SRMP must include the following: (a) stream realignment design objectives and principles; (b) a refined hydrological assessment, incorporating continuous flow gauging on the Mangapū Stream and Mangapū Tributary to inform the detailed design of the stream realignment; (c) detailed design drawings based on A035680017-WR-101 – 104, A035680017-WR-201 – 202, A035680017-WR-301 included in the consent application, illustrating layout, profiles, cross sections, and location of all features; (d) detailed methodology and timing for constructing the stream realignment; (e) methods for diverting upstream flows during the stream works, including how sufficient flow will be maintained at all times below the site of the works to maintain in-stream biota; (f) a description of erosion and sediment controls consistent with the certified ESCP required by Condition 42 (g) a description of methods to manage the discharge of contaminants to water during construction (e.g. hydrocarbons, construction	-

	materials); (h) planting plan showing riparian planting and revegetation of quarried benches above, including: (i) description of the source, species mix, size, spacing, density, and layout, of plants and planting methods to be used; (ii) timeframes for implementation; (iii) description of how maintenance of planting areas, including replacement of plants that do not survive, will be undertaken. (i) description of stream monitoring, including timeframes and measures of success; (j) provision for reporting on the performance of the stream works undertaken through the Annual Report required by Condition 64; and (k) a process for review of the SRMP to adapt to any changes in the receiving environment	
128	Rehabilitation of Mangapū Stream Tributary Realignment Riparian planting along the realignment of the Mangapū Tributary must be: (a) implemented in accordance with the certified Stream Diversion Management Plan required by Condition 62; (b) implemented immediately following completion of Construction of the realigned stream channel, except where Construction is completed outside the planting season in which case it should occur in the next planting season; and (c) completed no later than Stage 2	-
129	Canopy species along the realignment of the Mangapū Stream Tributary corridor must be: (a) planted in accordance with the certified Stream Diversion Management Plan required by Condition 62; (b) and planted in the next planting season following the establishment of the riparian planting required by Condition 111 to ensure appropriate shelter and survival conditions	-
130	Revegetation of quarried benches associated with	-

	the realignment of the Mangapū Stream Tributary must be: (a) planted in accordance with the certified Stream Diversion Management Plan required by Condition 62; (b) phased to follow Construction; and (c) undertaken as soon as practicable within the next available planting season	
131	All planting required by Conditions 111 – 113 must be maintained for at least five (5) years after planting is completed. Maintenance must include replacement of dead, dying, or diseased plants until canopy closure is achieved; and any additional works required to ensure successful establishment and ongoing sustained vegetation growth	I question whether 5 years maintenance is sufficient from a project of this scale and risk. I recommend amendments to this condition as follows: All planting required by Conditions 111-113 must be maintained for <u>at least a minimum of five (5) years after planting is completed and until it is demonstrated that the revegetated areas have been established to a point where 80% canopy cover is achieved, planting density meets or exceeds plan (stems/m²), there are no fruiting or flowering weed species present and long-term health and sustainability is ensured without the requirement for intensive management, whichever is the latest.</u> Maintenance must include replacement of dead, dying, or diseased plants until canopy closure is achieved; and any additional works required to ensure successful establishment and ongoing sustained vegetation growth.

132	Rehabilitation of Quarry Faces and Slopes and OBDA Areas Prior to the commencement of each of Stages 6, 7, and 8, the Consent Holder must prepare and submit to the Council for certification in accordance with Conditions 22 – 26 a Detailed Landscape Design and Planting Plan for progressive rehabilitation of the quarry faces and slopes and OBDA within that stage (when those areas are retired from quarrying). The Plan must expand on the rehabilitation plans within the certified Landscape Rehabilitation Strategy and Management Plan and must include: (a) site-specific planting specifications based on actual ground conditions. (b) a detailed planting schedule identifying species, densities, sizes, and spacing. (c) confirmation that all plant material will be ecosourced from the Hunua Ecological District. (d) methods for site preparation, planting, and maintenance. (e) staging of planting in relation to completion of Mineral Extraction Activities	-
133	Progressive rehabilitation of the quarry faces and slopes and OBDA within each stage must: (a) occur with each phase of quarry development (when those areas are retired from quarrying), or earlier where feasible; and (b) be completed prior to completion of the following stage	-
134	All planting required by Conditions 115 – 116 must be maintained for a minimum of five (5) years after planting is completed. Maintenance must include replacement of dead, dying, or diseased plants; and any additional works required to ensure successful establishment.	I question whether 5 years maintenance is sufficient from a project of this scale and risk. I recommend amendments to this condition as follows: All planting required by Conditions 115-116 must be maintained for a minimum of five (5) years after planting is completed <u>and until it is demonstrated that the revegetated areas have been established to a point where 80% canopy cover is achieved, planting density</u>

		<u>meets or exceeds plan (stems/m²), there are no fruiting or flowering weed species present and long-term health and sustainability is ensured without the requirement for intensive management.</u> Maintenance must include replacement of dead, dying, or diseased plants until canopy closure is achieved; and any additional works required to ensure successful establishment and ongoing sustained vegetation growth.
135	Off-Site Visual Mitigation Planting Within six (6) months of consent being granted, the Consent Holder must: (a) consult with the owners of the properties identified as experiencing moderate–high adverse visual effects within Viewing Groups S1, S2, W1, and W2 identified in the Landscape Effects Assessment; and (b) offer, at its cost, to appoint a SQEP to work collaboratively with each landowner to develop a Visual Mitigation Planting Plan to mitigate visual effects on the dwelling and its curtilage.	
136	The objective of each Visual Mitigation Planting Plan is to reduce the identified adverse visual effects on the dwelling and curtilage as far as practicable. Appropriate mitigation measures may include planting of native or exotic plant species at a maximum width of 5m to foreshorten and/or filter views towards the quarry.	Condition 136 should form a part of 135 as it is intrinsically linked to the understanding of the requirements of 135
137	The SQEP must visit each participating property to: (a) confirm the nature and extent of adverse visual effects on the dwelling and curtilage; and (b) identify and recommend appropriate mitigation planting within the property boundary; and (c) develop, with the landowner, a site-specific planting layout that responds to views, topography, existing vegetation, and landowner preferences.	Condition 137 should form a part of 135

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138	The Consent Holder must implement all agreed mitigation planting at its cost. Planting must be implemented in the next available planting season and within twelve months of the landowner accepting the mitigation proposal. <i>Advice note: Maintenance of mitigation planting is the responsibility of the landowner, unless an alternative arrangement is mutually agreed in writing between the Consent Holder and the landowner.</i>	-
139	The Consent Holder is considered to have complied with Conditions 135 – 138 if: (a) the SQEP is not granted access to the property to undertake the required assessment; or (b) the landowner agrees to the proposed mitigation, and the planting is implemented within the required timeframe; or (c) the landowner declines the offer of mitigation or refuses to engage in consultation; or (d) an alternative agreement regarding visual mitigation is reached between the Consent Holder and the landowner.	If the above conditions are rolled into one, then this reference would change of course.
140	The Consent Holder must provide the Council with a written record of: (a) the mitigation planting offered; (b) whether it was accepted or declined; and (c) confirmation of implementation (where applicable) within three months following completion of the agreed planting at each participating property.	-

Technical Specialist Memo - Hunua Quarry Expansion – 489 Hunua Road, Hunua Noise and Vibration Assessment

To: Emma Chandler – Lead Planner & Warwick Pascoe - PPL

From: Duffy Visser

Qualifications & Relevant Experience: I hold a Diploma in Public Health and have 29 years' experience in noise and vibration assessment and enforcement. I am a member of Acoustical Society of New Zealand. I have prepared expert evidence and technical assessments for resource consent applications and fast-track applications and have appeared as an expert witness before consent authorities on multiple occasions.

Preparation in Accordance with the Code of Conduct: I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Date: 12 May 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name: Hunua Quarry Expansion

Fast-Track application number: FTAA-2603-1185 (Council Reference BUN60464053)

Site address: 489 Hunua Road, Hunua

2.0 Documents Reviewed

- Assessment of Environmental Effects and Application for Resource Consent, prepared for Winstone Aggregates, dated 30 March 2026. (AEE)
- Acoustics and Vibration Assessment prepared by Styles Group, dated 23 March 2026. (the Acoustic report)
- Draft Operational Noise Management Plan, prepared by Styles Group, dated 23 March 2026. (ONMP)

3.0 Specialist Assessment

The acoustic report disregarded any noise and vibration effects on the following sites, for which written approval to the application has been provided: 369, 397, 411, 480-486, and 490 Hunua Road, 105, 106, 108, 115, 118, 119, and 195 Judge Richardson Drive, and 161, 163, 165, 167, 180, 193, and 255 Middleton Road.

I have assessed the effects of construction noise and vibration as well as the operational noise and vibration (including noise and vibration from blasting).

Operational Noise

Styles Group (SG) have undertaken a comprehensive quarry noise measurement project using the CetawareTM system. The data was used to create a computer noise model to predict the potential noise from all the operational activities.

Resource consent will be required for infringements of the following AUP standards:

- H28.6.2.1: Infringement of the Quarry effects Line (QEL) noise limits by activities in the Special Purpose Quarry Zone (SPQZ).
- H28.6.2.2: Deviation from the Auckland Unitary Plan (AUP) blasting noise and vibration standard to clarify ambiguities around monitoring and assessment and to adopt industry best practice.
- E25.6.31.(1): Infringement of the AUP blasting noise standard in the RMRZ at the boundaries of properties that are either owned by FCIL or where written approval was obtained.

The existing quarry is consented to operate on a 24-hour basis, but hours for general sales are restricted to between 6:00 am and 5:30 pm on Monday to Friday and between 6:00 am and 4:00 pm on Saturdays. The Project will generally retain these hours but will include occasional early morning activity during periods of high demand, when purchasing trucks will access the Site from 5:00 am. The noise from the purchasing trucks has been included in the operational noise assessments and calculation have shown that noise from the purchasing trucks complies with the proposed operational noise limits and will not exceed a reasonable level.

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The acoustic report suggested changes to the current operational noise and vibration compliance criteria and suggested consent conditions that are more suitable to assess compliance as an alternative. I agree with the reason for the suggested changes and that the proposed consent conditions should apply to the consent.

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Overall, the proposed conditions provide better controls than the operative AUP standards for all the surrounding residents in terms of potential noise and vibration effects. The proposed conditions include the requirement for an ONMP. SG have submitted a draft Operational Noise Management Plan.

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I consider that subject to the inclusion of recommended conditions and adherence to the Operational Noise Management Plan (ONMP) overall operational noise and vibration effects will be unlikely to exceed a reasonable level at the neighbouring properties.

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Construction noise and vibration

The activities of the project/proposal that is regarded as construction work include: vegetation clearance, haul road construction, culvert construction and stream realignment and rehabilitation work.

The acoustic report used measurement data to calculate construction noise levels at the neighbouring sites based on worst-case scenarios:

I agree with the acoustic report that, due to the substantial separation distances between the works and receivers, the predicted construction noise and vibration levels will comply with the relevant AUP limits by significant margins.

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4.0 Recommendation

Should the Expert Panel choose to grant this application I support the conditions proposed in the Acoustics and Vibration Assessment, subject to the changes recommended in Section 5 below. These will provide controls for noise management that are clear, enforceable, and will

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provide certainty for both the neighbouring residents and the Hunua Quarry operation. They will ensure that the noise effects associated with the construction works and operation of the quarry do not exceed a reasonable level at all relevant notional boundaries.

5.0 Proposed Conditions, comments and suggestions

Condition

38	Operational Noise Management Plan The objective of the Operational Noise Management Plan (ONMP) is to detail the measures and procedures to be implemented to minimise the operational noise and vibration effects and construction noise and vibration effects of the Project and ensure compliance with the noise and vibration limits and requirements in Conditions 78–85. 39. The ONMP must include: (a) roles and responsibilities for implementation of the ONMP; (b) a description of activities and noise sources at the Site; (c) the relevant noise and vibration limits; (d) the neighbouring receivers; (e) noise and vibration mitigation measures and operational restrictions required to ensure that the relevant noise and vibration limits are complied with; (f) procedures for undertaking noise and vibration monitoring; (g) procedures for communicating with the neighbours and managing any noise complaints; (h) corrective action measures; and (i) a process for review of the ONMP to adapt to any changes in the receiving environment or any material changes to the quarry vehicle fleet and machinery.
39	The ONMP must include: (a) roles and responsibilities for implementation of the ONMP; (b) a description of activities and noise sources at the Site; (c) the relevant noise and vibration limits; (d) the neighbouring receivers; (e) noise and vibration mitigation measures and operational restrictions required to ensure that the relevant noise and vibration limits are complied with; (f) procedures for undertaking noise and vibration monitoring; (g) procedures for communicating with the neighbours and managing any noise complaints; (h) corrective action measures; and (i) a process for review of the ONMP to adapt to any changes in the receiving environment or any material changes to the quarry vehicle fleet and machinery
Comment or suggestion	The ONMP has been provided and adequately addresses all noise and vibration management issues.
78	Construction Noise Construction works must only take place on site between the hours of 7.30am to 6:00pm, Monday to Saturday. This condition does not prevent quiet construction

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	work from taking place outside standard construction hours providing the noise emissions are inaudible at the notional boundary of any occupied dwelling.																																													
Comment or suggestion	I agree with this condition Add Advice note: Construction work includes (without limitation) temporary activities associated with vegetation clearance, stream realignment, rehabilitation work, and the construction of sediment retention ponds, haul roads, drainage networks, culverts, and earth bunds.																																													
79	Noise from Construction must not exceed the following limits when measured 1m from the façade of any building that contains an activity sensitive to noise that is occupied during the works, except that: (a) the noise limits do not apply at 369, 397, 411, 480 – 486, 489, and 490 Hunua Road, 105, 106, 108, 115, 118, 119, and 195 Judge Richardson Drive, and 161, 163, 165, 167, 168, 180, 193, and 255 Middleton Road, 101 Coal Mine Road, and Section 1 Survey Office Plan 417727 and Part Allotment 79 Parish of Hunua (North Auckland) (b) for Construction works involving a total duration that is less than 15 calendar days, the noise limits must be increased by 5dB in all cases; and (c) for Construction works involving a total duration that is more than 20 weeks the noise limits must be decreased by 5dB in all cases <table><tr><th rowspan="2">Time of week</th><th rowspan="2">Time Period</th><th colspan="2">Maximum noise level (dBA)</th></tr><tr><th>L_{eq}</th><th>L_{max}</th></tr><tr><td rowspan="4">Weekdays</td><td>6:30am – 7:30am</td><td>60</td><td>75</td></tr><tr><td>7:30am – 6:00pm</td><td>75</td><td>90</td></tr><tr><td>6:00pm - 8:00pm</td><td>70</td><td>85</td></tr><tr><td>8:00pm - 6:30am</td><td>45</td><td>75</td></tr><tr><td rowspan="4">Saturdays</td><td>6:30am – 7:30am</td><td>45</td><td>75</td></tr><tr><td>7:30am – 6:00pm</td><td>75</td><td>90</td></tr><tr><td>6:00pm - 8:00pm</td><td>45</td><td>75</td></tr><tr><td>8:00pm - 6:30am</td><td>45</td><td>75</td></tr><tr><td rowspan="4">Sundays and public holidays</td><td>6:30am – 7:30am</td><td>45</td><td>75</td></tr><tr><td>7:30am – 6:00pm</td><td>55</td><td>85</td></tr><tr><td>6:00pm - 8:00pm</td><td>45</td><td>75</td></tr><tr><td>8:00pm - 6:30am</td><td>45</td><td>75</td></tr></table> <i>Advice note: Activities sensitive to noise are defined as: any dwelling, visitor accommodation, boarding house, marae, papakāinga, integrated residential development, retirement village, supported residential care, care centres, lecture theatres in tertiary education facilities, classrooms in education facilities and healthcare facilities with an overnight stay facility</i>	Time of week	Time Period	Maximum noise level (dBA)		L _{eq}	L _{max}	Weekdays	6:30am – 7:30am	60	75	7:30am – 6:00pm	75	90	6:00pm - 8:00pm	70	85	8:00pm - 6:30am	45	75	Saturdays	6:30am – 7:30am	45	75	7:30am – 6:00pm	75	90	6:00pm - 8:00pm	45	75	8:00pm - 6:30am	45	75	Sundays and public holidays	6:30am – 7:30am	45	75	7:30am – 6:00pm	55	85	6:00pm - 8:00pm	45	75	8:00pm - 6:30am	45	75
Time of week	Time Period			Maximum noise level (dBA)																																										
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Comment or suggestion	I agree with this condition.																																													
80	Noise from Construction works must not exceed the following levels when measured 1m from the façade of any other building that is occupied during the works, except that: (a) the noise limits do not apply at 369, 397, 411, 480 – 486, 489, and 490 Hunua Road, 105, 106, 108, 115, 118, 119, and 195 Judge Richardson Drive, and 161, 163, 165, 167, 168, 180, 193, and 255 Middleton Road, 101 Coal Mine Road, and Section 1 Survey Office Plan 417727 and Part Allotment 79 Parish of Hunua (North Auckland);																																													

0.261

0.262

	(b) for Construction works involving a total duration that is less than 15 calendar days, the noise limits may be increased by 5dB in all cases; and (c) for Construction works involving a total duration that is more than 20 weeks the noise limits may be decreased by 5dB in all cases: <table><tr><th>Time Period</th><th>Maximum noise levels L_{eq} (dBA)</th></tr><tr><td>7:30am – 6:00pm</td><td>75</td></tr><tr><td>6:00pm – 7:30am</td><td>80</td></tr></table>	Time Period	Maximum noise levels L_{eq} (dBA)	7:30am – 6:00pm	75	6:00pm – 7:30am	80					
Time Period	Maximum noise levels L_{eq} (dBA)											
7:30am – 6:00pm	75											
6:00pm – 7:30am	80											
Comment or suggestion	I agree with this condition											
81	Construction Vibration Construction works must be controlled to ensure any resulting vibration does not exceed: (a) the limits set out in DIN 4150-3: 1999 when measured in accordance with that Standard on any structure not on the same site; and (b) the following limits in buildings in any axis when measured in the corner of the floor of the storey of interest for multi-storey buildings, or within 500mm of ground level at the foundation of a single storey building <table><tr><th>Receiver</th><th>Period</th><th>Peak Particle Velocity Limit (mm/s)</th></tr><tr><td rowspan="2">Occupied activity sensitive to noise</td><td>Night time 10pm to 7am</td><td>0.3 mm/s</td></tr><tr><td>Daytime 7am to 10pm</td><td>2 mm/s</td></tr><tr><td>Other occupied buildings</td><td>At all times</td><td>2 mm/s</td></tr></table> except that the vibration limits do not apply at 369, 397, 411, 480 – 486, 489, and 490 Hunua Road, 105, 106, 108, 115, 118, 119, and 195 Judge Richardson Drive, and 161, 163, 165, 167, 168, 180, 193, and 255 Middleton Road, 101 Coal Mine Road, and Section 1 Survey Office Plan 417727 and Part Allotment 79 Parish of Hunua (North Auckland).	Receiver	Period	Peak Particle Velocity Limit (mm/s)	Occupied activity sensitive to noise	Night time 10pm to 7am	0.3 mm/s	Daytime 7am to 10pm	2 mm/s	Other occupied buildings	At all times	2 mm/s
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	Daytime 7am to 10pm	2 mm/s										
Other occupied buildings	At all times	2 mm/s										
Comment or suggestion	I agree with this condition											
82	Construction works generating vibration for three days or less between the hours of 7.00am to 6.00pm may exceed the limits in Condition 81, but must comply with a limit of 5mm/s peak particle velocity in any axis when measured in the corner of the floor of the storey of interest for multi-storey buildings, or within 500mm of ground level at the foundation of a single storey building, where: (a) all occupied buildings within 50m of the extent of the works generating vibration are advised in writing no less than three days prior to the vibration-generating works											

0.263

0.264

	commencing; and (b) the written advice must include details of the location of the works, the duration of the works, a phone number for complaints and the name of the site manager; except that the vibration limits do not apply at 369, 397, 411, 480 – 486, 489, and 490 Hunua Road, 105, 106, 108, 115, 118, 119, and 195 Judge Richardson Drive, and 161, 163, 165, 167, 168, 180, 193, and 255 Middleton Road, 101 Coal Mine Road, and Section 1 Survey Office Plan 417727 and Part Allotment 79 Parish of Hunua (North Auckland).									
Comment or suggestion	I agree with this condition	0.265								
83	Operational Noise 83. All Mineral Extraction Activities except blasting must comply with the following limits when measured and assessed in accordance with NZS 6801:2008 and 37NZS 6802:2008. The noise limits apply at the notional boundary of any site outside the Special Purpose – Quarry Zone except at 369, 397, 411, 480 – 486, 489, and 490 Hunua Road, 105, 106, 108, 115, 118, 119, and 195 Judge Richardson Drive, and 161, 163, 165, 167, 168, 180, 193, and 255 Middleton Road, 101 Coal Mine Road, and Section 1 Survey Office Plan 417727 and Part Allotment 79 Parish of Hunua (North Auckland). <table><tr><th>Times</th><th>Noise levels</th></tr><tr><td>7.00am – 6.00pm Monday to Friday</td><td>55dB LAeq</td></tr><tr><td>7.00am – 4.00pm Saturday</td><td>55dB LAeq</td></tr><tr><td>All other times:</td><td>45dB LAeq / 75dB LAfmax</td></tr></table> Advice note: The Site may operate 24 hours a day/7 day a week, subject to complying with the above noise levels.	Times	Noise levels	7.00am – 6.00pm Monday to Friday	55dB LAeq	7.00am – 4.00pm Saturday	55dB LAeq	All other times:	45dB LAeq / 75dB LAfmax	
Times	Noise levels									
7.00am – 6.00pm Monday to Friday	55dB LAeq									
7.00am – 4.00pm Saturday	55dB LAeq									
All other times:	45dB LAeq / 75dB LAfmax									
Comment or suggestion	I agree with this condition	0.266								
84	Tonal reversing alarms (beepers) must not be used on quarry-based machinery. Alternatives without tonal characteristics such as broadband reversing alarms (squawkers) are permitted									
Comment or suggestion	I agree with this condition	0.267								
85	Blasting Noise and Vibration 85. All blasting on the Site must comply with the following limits, except that overpressure limits do not apply at 369, 397, 411, 480 – 486, 489, and 490 Hunua Road, 105, 106, 108, 115, 118, 119, and 195 Judge Richardson Drive, and 161, 163, 165, 167, 168, 180, 193, and 255 Middleton Road, 101 Coal Mine Road, and Section 1 Survey Office Plan 417727 and Part Allotment 79 Parish of Hunua (North Auckland); (a) Overpressure generated by explosives must comply with a limit of 128 dB LZpeak when measured at the notional boundary of any dwelling outside the									

	Special Purpose — Quarry Zone. Overpressure must be measured in accordance with the guidance of Appendix J Ground Vibration and Airblast Overpressure of AS 2187.2:2006. (b) Vibration generated by blasting activities must comply with the limits set out in DIN 4150-3 2016 when measured and assessed in accordance with the Standard. (c) All blasting is restricted to the following except where it is necessary for safety reasons: (i) Blasting must only take place between 9:00am and 5:00pm on Monday to Saturday. (ii) The number of blasts over any calendar fortnight must not exceed an average of two per day. (d) A siren must be used prior to blasting to alert people in the vicinity.
Comment or suggestion	Replace with: All blasting on the Site must comply with the following limits, except that overpressure limits do not apply at 369, 397, 411, 480 – 486, 489, and 490 Hunua Road, 105, 106, 108, 115, 118, 119, and 195 Judge Richardson Drive, and 161, 163, 165, 167, 168, 180, 193, and 255 Middleton Road, 101 Coal Mine Road, and Section 1 Survey Office Plan 417727 and Part Allotment 79 Parish of Hunua (North Auckland); (a) Overpressure generated by using explosives within the <i>Special Purpose — Quarry Zone</i> must comply with a limit of 128 dB LZpeak when measured at the notional boundary of any dwelling outside the zone. Overpressure generated by using explosives within the <i>Rural — Mixed Rural Zone</i> must comply with a limit of 120 dB LZpeak when measured at the boundary of any other site. Overpressure must be measured in accordance with the guidance of Appendix Ground Vibration and Airblast Overpressure of AS 2187.2:2006 Explosives— Storage and use, Part 2:Use of explosives. (b) Vibration generated by blasting activities must comply with the limits set out in DIN 4150-3 2016 when measured and assessed in accordance with the Standard. (c) All blasting is restricted to the following except where it is necessary for safety reasons: (i) Blasting must only take place between 9:00am and 5:00pm on Monday to Saturday. (ii) The number of blasts over any calendar fortnight must not exceed an average of two per day. (d) A siren must be used prior to blasting to alert people in the vicinity.

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name: Hunua Quarry Development Substantive Application

Fast-Track application number: FTAA-2603-1185

Council application numbers: BUN60464053 (LUC60464054)

2.0 Technical Specialist Memo – Earthworks & Erosion and Sediment Control

To: Emma Chandler, Consultant Planner
Warwick Pascoe – Principal Project Lead

From: Steve Bryant (Bryant Environmental Solutions Ltd on behalf of Earth, Streams & Trees Team, Auckland Council)

Qualifications & Relevant Experience:

I have 26 years of full-time experience providing specialist erosion and sediment control services mainly to Regional Councils, and on the recommendation from Greater Wellington Regional Council I was contracted to the NZTA as one of three members of the Sediment Management Peer Review Panel (SMPRP) for the Transmission Gully project from 2013 to 2020.

I have a proven track record as a key witness with successful enforcement action for Auckland Council and Waikato Regional Council. Experienced with all forms of enforcement, including Abatement Notices, Infringement Notices and seven prosecutions (as Council's key witness) in the Environment Court.

I have an extensive understanding of RMA and consent processing/monitoring with an excellent understanding of the intent of consent conditions and the practical assessment/evaluation of effective site controls.

Preparation in Accordance with the Code of Conduct:

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Signature:



Date:

30 July 2026

3.0 Executive Summary

Winstone is seeking approval for the project under the Fast-Track Approvals Act 2024 (FTAA). The Hunua Quarry Development is a Listed Project in Schedule 2 of the FTAA, reflecting its regional and national significance. The proposal is to expand the existing quarry to increase annual quarry production to a peak of approximately 5.4 million tonnes of aggregate, and to enable the continued extraction of aggregate for a further 80 years ("the Project") or also referred to as the "quarry development area". Through this approval process, Winstone proposes to update the consent conditions and quarry management plans applying to the site to incorporate the changes and enable greater operational efficiency.

0.045

This memorandum reviews the applicant's proposal to undertake earthworks of approximately 23,398 million m³ over an area of 108ha.

0.046

To manage the potential effects of earthworks, the applicant has provided an *Erosion and Sediment Control Assessment Report. Hunua Quarry – Substantive Application under the Fast Track Approvals Act 2025*, (Infrastructure Report), and supporting engineering drawings, Erosion and Sediment Control Plans (ESCP) that proposes erosion and sediment control measures designed in accordance with the guidelines of Auckland Council's GD05 document, and industry best practice.

The assessment concludes that, provided the earthworks are undertaken in accordance with the application documents, including a final Infrastructure Report and ESCP, and earthworks related conditions of consent, that the potential effects associated with all land disturbance will be appropriately managed.

0.047

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- *Part B. Hunua Quarry Development Substantive Application Part B – Assessment of Environmental Effects and Application for Resource Consent*. Prepared for Winstone Aggregates. 30 March 2026. Revision Final. Prepared by Boffa Miskell Limited. (AEE)
- *Erosion and Sediment Control Assessment Report. Hunua Quarry – Substantive Application under the Fast Track Approvals Act 2025*. Prepared for Winstone Aggregates. Date June 2026. Revision 2 (19/06/0226). Prepared by MPD Environmental Limited. (Infrastructure Report)

- *Erosion and Sediment Control Plan Drawings. Drawing No: ESCP-HQ-01, Rev: 2 (19/06/2026). Prepared by MPD Environmental Limited. (Plans)*
- *Erosion and Sediment Control Plan Drawings. Drawing No: ESCP-HQ-02, Rev: 2 (19/06/2026). Prepared by MPD Environmental Limited. (Plans)*
- *Hunua Quarry Expansion Erosion and Sediment Control Plan. Drawing Ref: ESCP-HQ-03, Rev: 2. Prepared by MPD Environmental Limited. (Plans)*
- *Hunua Quarry Expansion Erosion and Sediment Control Plan. Drawing Ref: ESCP-HQ-04, Rev: 2. Prepared by MPD Environmental Limited. (Plans)*
- *Erosion and Sediment Control Plan – Western Haul Road. Drawing Ref: ESCP-HQ-05, Rev: 2. Prepared by MPD Environmental Limited. (Plans)*
- *Hunua Quarry Expansion Erosion and Sediment Control Plan. Drawing Ref: ESCP-HQ-06, Rev: 2. Prepared by MPD Environmental Limited. (Plans)*
- *Hunua Quarry Expansion Erosion and Sediment Control Plan. Drawing Ref: ESCP-HQ-07, Rev: 2. Prepared by MPD Environmental Limited. (Plans)*
- *Hunua Quarry Expansion Erosion and Sediment Control Plan. Drawing Ref: ESCP-HQ-08, Rev: 2. Prepared by MPD Environmental Limited. (Plans)*
- *Hunua Quarry Expansion Erosion and Sediment Control Plan. Drawing Ref: ESCP-HQ-09, Rev: 2. Prepared by MPD Environmental Limited. (Plans)*
- *Hunua Quarry Expansion Erosion and Sediment Control Plan. Drawing Ref: ESCP-HQ-10, Rev: 2. Prepared by MPD Environmental Limited. (Plans)*
- Additional information received under section 92 of the Resource Management Act (RMA), by email with updated drawings and document from MPD Environmental Limited on 15, 22 and 28 July 2026 in relation to ESCP.

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

The applicant has identified the reasons for consent relating to earthworks under chapter E11 of the Auckland Unitary Plan (AUP). I concur with those reasons for consent.

6.0 Specialist Assessment

The potential environmental effects of the proposed earthworks are primarily associated with the diversion and realignment of the Mangapu Stream, and the longer-term development of the site to enable construction of haul roads and other associated earthworks activities.

6.1 Earthworks - Erosion and Sediment Controls

To manage potential sediment discharges resulting from the proposed earthworks, the applicant has prepared a suitable ESCP in accordance with Auckland Council guidance document number 005, "Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region", June 2016, Incorporating Amendment 3 (GD05).

The proposed erosion and sediment controls for the site include the following:

Sediment Retention Ponds (SRP), Decanting Earth Bunds (DEBs), Silt Fences (SFs), Super Silt Fences (SSFs), Dirty Water Diversions (DWDs), Clean Water Diversions (CWDs), and a Stabilised Construction Entrance. I consider the applicant's proposal in this regard to be in accordance with GD05, and I support the applicant's proposal in this regard.

The Symonds Hill Pit development is proposed to occur in eight indicative stages to allow continuous production while progressively implementing environmental mitigation and rehabilitation. However, to enable operational flexibility and the need to respond to market conditions, the staging and programme may not be followed sequentially. Table 2 below identifies each stage, an overview of the activities to be undertaken and whether these are part of the enabling works or 'business as usual' quarrying activity.

Table 2: Staging and Indicative Life-of-Quarry Development Plan Overview

Stage	Activity	Nature of the works	Approximate duration (years)
1	Tributary realignment including the construction of a temporary bridge.	Enabling works	4
1	Stripping campaign to the northwest (NW), -, occurs concurrently with the tributary realignment. Provided for under existing consents.	Extraction and processing	1-4
2	Stream diversion completed – the temporary bridge will be removed.	Enabling works	1
2	NW cut down to 105RL. Provided for under existing consents.	Extraction and processing	1
2	Construct the western haul road.	Enabling works	1
3	Incremental stripping campaigns: South from current pit crest towards stream diversion down to 120RL	Extraction and processing	1

4	Incremental stripping campaigns: Southwest of the stream diversion and adjacent to the southern site boundary	Extraction and processing	43-73
5	Incremental stripping campaigns: Southern boundary towards the current pit	Extraction and processing	43-73
6	Incremental stripping campaigns: In an anticlockwise direction, extending the pit to the south and northwest and deepening the pit	Extraction and processing	43-73
7	Realign the western haul road, so that it runs, for a short distance, along the southeast extent of the pit. This will enable the pit to extend to the northwest.	Enabling works	43-73
7	Incremental stripping campaigns: in an anticlockwise direction, extending the pit to the southwest and northwest and deepening the pit	Extraction and processing	43-73
8	Incremental stripping campaigns: in an anticlockwise direction, extending the pit to the northwest and north	Extraction and processing	43-73

I consider the proposed controls detailed within the ESCP are in accordance with best.

ESCP Revision/Updates

It is anticipated that the ESCP will evolve over time, as erosion and sediment control methodologies develop alongside legislation and consent requirements. The ESCP will be a working document and will be updated regularly as required, with all changes submitted for certification to Auckland Council prior to works commencing.

Reasons for making changes to the ESCP will be documented. Any new/updated version of the ESCP documentation will be issued with an updated version number and dated. A copy of the current ESCP document and subsequent versions will be kept for the Project records. Superseded versions will be marked as obsolete.

Any relevant revisions to the ESCP will be submitted to the Auckland Council for review and certification at least 10 days before becoming operational.

Chemical Treatment

The applicant has proposed chemical treatment (flocculation) for the sediment control devices. It is well proven that chemical treatment will increase the overall efficiency of sediment controls treating Auckland soil types. As such, the provision of a Chemical Treatment Management Plan (ChTMP) for Auckland Council approval prior to

works commencing, and the chemical treatment of the SRPs throughout the earthwork's operation has been recommended and a condition has been included below.

0.050

Timing & Seasonal Restriction

The applicant seeks consent for a duration of 35 years. Given the scale of the works and the receiving environment, a seasonal restriction is proposed. This will suitably ensure the earthworks are undertaken during the standard Auckland Council earthworks season, being 1 October to 30 April of any year. This is consistent with similar earthworks proposals in the Auckland Region and will help ensure appropriate management of the works should the applicant intend to work during the wetter, winter months. I support the applicant's proposal in this regard.

0.051

6.2 Stream Works - methodologies

The proposal accommodates diversions, culverts, bridges and works associated with stream realignments that require streamworks consent. The applicant provided a proposed range of generic control options that, depending on the nature of the works, will be decided upon during construction and managed via the various proposed management plans.

0.052

I consider the applicant's Streamworks proposal to be in accordance with GD05, and I support the proposed methodologies. These are outlined below.

General Online Stream Diversion Methodology (structure installed within the existing stream)

There are two options to consider for online stream diversions – over-pumping or construction of a stream diversion channel to allow the water to by-pass the worksite.

1. Dam and Divert Methodology:

Damming a stream and pumping the flows around the worksite back to the stream considerably minimises disturbance relative to constructing a new diversion channel. With high flow streams, diversions are sometimes the only option; however, with most small streams, damming and pumping are less harmful to the environment and relatively simple to carry out.

The installation of a culvert (or bridge requiring in-stream works) using an online methodology will be undertaken in the following manner:

A dam is constructed across the stream with stabilised materials such as sandbags, sheet metal plate or other suitable construction materials. A pump will be installed in the dam and sufficient hose length must be available to reach below the extent of in-stream works.

The pump inlet should be placed in a drum with holes to minimise the possibility of sucking sediment from the bottom of the dam. Inclusion of a fish screen is required. The outlet should be directed to a stabilised area with an energy dissipater such as rip-rap boulders or similar.

A dam and pump methodology can only be used for works with a short duration or where the site can be stabilised at the end of each workday, so that flows can continue through the stream channel. Generally, it is not considered appropriate to implement a dam and pump methodology where the pump is required to be operating day and night for the duration of the operation (due to noise and pump reliability issues).

Sizing the pumped diversion for a given storm event depends on the duration of the stream diversion. As a minimum, the temporary pumping should be sized for a one-year peak discharge from the contributing catchment. These design parameters are based on the assumption that full channel 5% AEP (20 year) capacity is made available overnight or when storm events are predicted.

2. Temporary Stream Diversion

These short-term watercourse diversions allow work to occur within the main watercourse channel. This includes:

- Size the diversion channel to allow for a 5% AEP rain event but consider the implications for secondary flow paths and upstream flood effects of having a larger event, up to 1% AEP.
- The diversion channel should be excavated leaving a plug at each end so that the watercourse does not breach the diversion.
- Stabilise the channel with, at a minimum, polythene and geotextile. This depends on the velocity of the water. Rip rap may be required to prevent scour and erosion.
- Once the channel is stabilised, open the downstream plug to allow water to flow up the channel, keeping some water within the channel to reduce problems when the upstream plug is excavated. Then open the upstream plug, allowing water to flow into the channel.
- A non-erodible dam should be placed immediately in the upstream end of the existing channel. A steel plate or earth bund (immediately stabilised) could be used.
- A non-erodible downstream dam should then be installed to prevent backflow into the construction area. The structure and all channel works are then completed.
- Once the culvert works are complete, the downstream dam should be removed first, allowing water to flood back into the original channel. The upstream dam is then removed, and both ends of the diversion channel are filled in with non-erodible material. Any sediment-laden water should be pumped to a sediment retention pond or dewatered. The remainder of the diversion channel should be filled in and stabilised.

Offline Stream Diversion methodology (structure installed adjacent to the existing stream)

The installation of a culvert (or bridge requiring in-stream works) using an offline methodology will be undertaken in the following manner:

- Suitable access will be formed to provide access to the site.
- Where the installation area is not already impounded by site perimeter controls, a silt fence will be installed between the culvert installation area and the stream.
- The culvert(s) will be installed, as close to the existing stream as practical without breaching the banks of the stream.
- Any excavated material unsuitable for backfill will be removed from the work area for disposal in an existing controlled stockpile area. Material suitable for backfill will be appropriately stockpiled and protected from erosion and sediment discharge.
- Any groundwater encountered during this operation will be pumped to a suitable sediment retention device such as a silt fence or SRP. If the water is clean and meets discharge consented limits, it can be pumped directly off-site following the dewatering/pumping protocol. A permit to pump form will be completed for any pumping activities.
- The required channels to and from the end of the culverts to the stream will be excavated and stabilised (to final detail) to within approximately 0.5m of the stream.

- In an ephemeral stream the final connections will simply be excavated and stabilised within 1 day.
- During this operation the existing stream channel will be 'plugged' at each end with the outside face stabilised with geotextile.
- In a perennial stream the final connections will be made under a short term (1 day) over pumping operation
- Once complete, suitable perimeter controls (typically silt fences) will be installed around the wing walls to control runoff from these isolated areas if required, or otherwise fully stabilised.

Stream flows will then be allowed to enter the culvert.**Over Pumping and Dewatering**

Over pumping operations may be required at certain stages of the work if required or a change in methodology is required. This is anticipated to be on a short-term basis only (<24hrs). And, as the earthworks progress, a certain degree of dewatering may be required. The ESCP component of this report would need to be updated to reflect this change.

I consider the applicant's Streamworks proposal to be in accordance with GD05, and I support the applicant's proposal.

6.3 – Conclusion

With regard to the proposed earthworks, the applicant states that best practice ESC measures will be utilised to ensure the proper management of any potential sediment related effects, and that any resulting effects will be less than minor. An assessment of the technical aspects of the earthworks and sediment control methodology has been undertaken and provided the earthworks are completed in accordance with the application documents and all supporting information, including any additional recommendations noted above, I concur with the applicant's assessment and consider that the potential effects associated with sediment discharge will be appropriately managed.

0.053

7.0 Section 67 Information Gap

Regarding the proposed earthworks, I have identified that there are no section 67 information gaps.

8.0 Recommendation

Based on the information available regarding the proposal's earthworks, including erosion and sediment control and construction water management, I support the application.

9.0 Proposed Conditions

Table 1 below contains the earthworks related conditions proposed by the applicant. As per the Infrastructure Report included with the application documents, I have followed the numbering of Draft Conditions agreed to date.

0.054

Table 1 – Applicants Proposed Consent Conditions.

Condition	Proposed Conditions	Comment or suggestion
1	Except as provided for in the conditions below, the Project must be undertaken in general accordance with: (a) the information submitted with the Application; (b) the applicant's responses to section 67 FTAA requests for further information dated [insert date]; and (c) responses to section 51 reports and comments received in relation to the Project dated [insert date]; as referenced by the Council under consent reference number BUN60464053 and comprised of the following information (being documents, plans, drawings, reports, and management plans): • <i>Part B. Hunua Quarry Development Substantive Application Part B – Assessment of Environmental Effects and Application for Resource Consent. Prepared for Winstone Aggregates. 30 March 2026. Revision Final. Prepared by Boffa Miskell Limited. (AEE)</i> • <i>Erosion and Sediment Control Assessment Report. Hunua Quarry – Substantive Application under the Fast Track Approvals Act 2025. Prepared for Winstone Aggregates. Date June 2026. Revision 2 (19/06/2026). Prepared by MPD Environmental Limited. (Infrastructure Report)</i> • <i>Erosion and Sediment Control Plan Drawings. Drawing No: ESCP-HQ-01, Rev: 2 (19/06/2026). Prepared by MPD Environmental Limited. (Plans)</i> • <i>Erosion and Sediment Control Plan Drawings. Drawing No: ESCP-HQ-02, Rev: 2 (19/06/2026). Prepared by MPD Environmental Limited. (Plans)</i> • <i>Hunua Quarry Expansion Erosion and Sediment Control Plan. Drawing Ref: ESCP-HQ-03, Rev: 2. Prepared by MPD Environmental Limited. (Plans)</i>	I agree with this condition.

	• <i>Hunua Quarry Expansion Erosion and Sediment Control Plan. Drawing Ref: ESCP-HQ-04, Rev: 2. Prepared by MPD Environmental Limited. (Plans)</i> • <i>Erosion and Sediment Control Plan – Western Haul Road. Drawing Ref: ESCP-HQ-05, Rev: 2. Prepared by MPD Environmental Limited. (Plans)</i> • <i>Hunua Quarry Expansion Erosion and Sediment Control Plan. Drawing Ref: ESCP-HQ-06, Rev: 2. Prepared by MPD Environmental Limited. (Plans)</i> • <i>Hunua Quarry Expansion Erosion and Sediment Control Plan. Drawing Ref: ESCP-HQ-07 , Rev: 2. Prepared by MPD Environmental Limited. (Plans)</i> • <i>Hunua Quarry Expansion Erosion and Sediment Control Plan. Drawing Ref: ESCP-HQ-08, Rev: 2. Prepared by MPD Environmental Limited. (Plans)</i> • <i>Hunua Quarry Expansion Erosion and Sediment Control Plan. Drawing Ref: ESCP-HQ-09, Rev: 2. Prepared by MPD Environmental Limited. (Plans)</i> • <i>Hunua Quarry Expansion Erosion and Sediment Control Plan. Drawing Ref: ESCP-HQ-10, Rev: 2. Prepared by MPD Environmental Limited. (Plans)</i>	
38	Erosion and Sediment Control Plan The objective of the Erosion and Sediment Control Plan (ESCP) is to detail the measures and procedures to be implemented in accordance with GD05 to minimise the discharge of debris, soil, silt, sediment or sediment-laden water beyond the Site or into watercourses and receiving waters, and ensure compliance with the requirements in Conditions 110 - 114. The ESCP must be updated annually by 30 April each year, and re-certified in accordance with Conditions 22 - 26.	I agree with this condition.
39	The ESCP must include:	I agree with this condition.

	(a) the expected area of quarry operations and areas to be worked over the next 12 months; (b) plans for Earthworks, including overburden stripping and disposal, over the next 12 months with specific reference to any works proposed for the period between the 30th April and 1st of October; (c) areas of vegetation removed, and areas stabilised and/or rehabilitated over the previous 12 months; (d) details of product stockpiling activities; (e) maintenance activities for erosion and sediment controls undertaken in the previous 12 months, and maintenance activities proposed over the next 12 months. (f) any problems in respect of water management on the Site during the previous 12 months, and proposals for addressing such problems; (g) detailed plans showing the location of sediment controls, on-site catchment boundaries, and sources of runoff; (h) drawings and specifications of designated sediment controls, including design calculations confirming that the erosion and sediment control measures have been sized appropriately in accordance with GD05; and (i) results of the previous 12 months of water quality monitoring required under Conditions 115– 119, including summarised rainfall data and an assessment of the sampling results. (j) procedures for water quality monitoring consistent with those in Conditions 105 - 108, including monitoring locations, limits, and reporting requirements.	
40	Chemical Treatment Management Plan The objective of the Chemical Treatment Management Plan (CTMP) is to detail the procedures for the treatment of SRP's and any other	I agree with this condition.

	impoundment devices during Earthworks at the Site to enhance sediment retention efficiency in accordance with GD05 and ensure compliance with the requirements in Condition 113.	
41	The CTMP must include: (a) roles and responsibilities for operation and maintenance of the chemical treatment system; (b) design details of the chemical treatment system based on a rainfall activated methodology for the site's SRP's, and any other impoundment devices; (c) water dosing treatment procedures, including optimum dosage; (d) monitoring, maintenance and contingency procedures; (e) a spill contingency plan; and (f) results of initial chemical treatment trial.	I agree with this condition.
107	Stream Works The Consent Holder must ensure that, during the realignment of the Mangapū Tributary, direct discharge of sediment laden water to the stream during Construction is minimised. Any sediment laden discharge pumped or otherwise diverted from the works area must be discharged only after treatment in a sediment control device provided in accordance with the certified ESCP and CTMP required under Conditions 38 and 40.	I agree with this condition.
109	Seasonal Restriction on Earthworks Earthworks on the Site, other than rock extraction, must not be undertaken between 1 May and 30 September in any year, unless a 'Request for winter works' has been made to and approved by AC. All requests granted by the Council must be renewed annually prior to the approval expiring, and Earthworks must not occur until written approval has been received from the Council.	I agree with this condition.

	Advice note: All winter works will be re-assessed monthly or as required by the Council to ensure that adverse effects are not occurring in the receiving environment. Approval may be revoked by Council upon written notice to the consent holder.	
110	Erosion and Sediment Controls The Consent Holder must design, construct and maintain all erosion and sediment control measures in accordance with GD05.	I agree with this condition.
111	The Consent Holder must ensure that all erosion and sediment control measures required by the certified ESCP required by Condition 38 are constructed and operational before Earthworks commence.	I agree with this condition.
112	Within ten working days following completion of each specific erosion and sediment control device as detailed in the certified ESCP (i.e. SRP's, DEB's, and clean and dirty water diversion bunds), a SQEP must provide written certification to AC that the erosion and sediment control measures have been constructed and completed in accordance with the certified ESCP and GD05. Advice note: Suitable documentation for certification of erosion and sediment control devices, can be obtained in Appendix C of GD05: Erosion and Sediment Control construction quality checklists.	I agree with this condition.
113	All SRPs and any other impoundment device utilised on the Site, must be chemically treated in accordance with the certified CTMP required by Condition 44 for the duration of the Earthworks.	I agree with this condition.
114	The operational effectiveness and efficiency of all erosion and sediment control measures required by the certified ESCP, must be maintained throughout the duration of Earthworks until areas of disturbed or bare earth are permanently stabilised against erosion in accordance with Condition 120. Maintenance must be undertaken in accordance with the certified ESCP and GD05 and a record of any maintenance work must be kept and be supplied to	I agree with this condition.

	AC on request.	
120	Stabilisation of Earthworks The Consent Holder must ensure that all disturbed and bare earth areas are: (a) revegetated or stabilised as soon as practicable upon completion or abandonment of Earthworks; and (b) revegetation or stabilisation is completed in general accordance with the measures set out in the certified ESCP and GD05. This condition does not apply to areas being actively worked, areas subject to rock extraction, and cut rock faces. Advice note: Stabilisation means when disturbed or bare earth areas are covered by a permanent erosion proof ground cover and includes aggregate, rock, polymer or vegetative cover which has obtained a density of more than 80 % of a normal pasture sward.	I agree with this condition.

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name: Hunua Quarry Expansion

Fast-Track application number: FTAA-2603-1185

Council application number: BUN60464053

2.0 Technical Specialist Memo – Economics

To: Warwick Pascoe (Principal Project Lead) and Emma Chandler (Planner)

From: Rodney Yeoman, Director, Formative

Qualifications & Relevant Experience:

I hold the qualification(s) of: Bachelor of Commerce and Bachelor of Laws from the University of Auckland and Postgraduate Honours in Economics from the Australian National University and have 20 years of experience in economics e.g. policy assessment, industry and markets research, the form and function of urban economies.

I am a full member of New Zealand Association of Economists, Population Association of New Zealand, and New Zealand Association for Impact Assessment. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, and Fast-track Approvals Act (FTAA) applications, and have appeared as an expert witness before consent authorities and the Environment Court on multiple occasions.

Preparation in Accordance with the Code of Conduct:

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses ([Code](#)), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Signature:



Date: 27 July 2026

3.0 Executive Summary / Principal Issues

- This specialist response reviews the Economic Assessments provided in support of the proposed Hunua Quarry Expansion. I conclude that the proposal aligns with the purpose of the FTAA, and I therefore support the development on economic grounds.
- My review and involvement with the project includes the following:
 - **Pre-substantive Application Review:** review of high-level economic effects report (Appendix B of Application FTA368).
 - **Pre-substantive Application Engagement:** conferencing with applicant's economist (17/12/2025) on economic matters to be addressed in the substantive application.
 - **Substantive Application Review:** review of economic assessment report (Appendix B12.4.4, 27 March 2026) and draft review 29 April provided to Auckland Council, which was shared with the application.
 - **Post-substantive Application Engagement:** conferencing with applicant's economist (20/05/2025) on economic matters to be addressed, set of actions, and peer-review of aspects of the applicants economic modelling.
 - **Updated Substantive Application:** review of the updated economic assessment report (22 May 2026) and examination of updated modelling of avoided emissions and social costs.
 - **Updated-substantive Application Engagement:** emails and discussions with applicant's economist 17-30 June 2026 on outstanding issues and examination of total resource value, and
 - **Finalised Substantive Application review:** provided final review to Auckland Council.
- The Economic Assessment highlights the importance of aggregates as essential inputs to the economy, particularly for infrastructure (e.g. roading) and construction industry. Due to their heavy and bulky nature, aggregate is costly to transport between locations and across regions. I agree that these are the primary economic issues arising from the Hunua Quarry Expansion. 0.162
- The Economic Assessment assesses the demand and supply of aggregates in the Auckland region and identifies a shortfall. It considers that this deficit is likely met through imports from Waikato (Smythes Quarry) and Northland (Maungaturoto Quarry), which could in part be supplied if Hunua Quarry Expansion is developed. While I acknowledge that a supply shortfall may exist in the region, the methodology used to estimate demand relies on a simple demand estimate using per capita assumption rather than modelling the key drivers of demand for aggregates, such as infrastructure investments and construction activity. As a result, the estimated shortfall may be overstated. This gap in data and modelling is acknowledged by the applicant's economist, and there is agreement that it would be difficult to apply a more robust estimation method. 0.163
- The increase in quarry operational and construction activities arising from the proposal were previously described as "significant" in the Economic Assessments and the revised assessment has removed this description. There is agreement that the quarry operational and construction activities arising from the

proposal are important in Auckland, however not regionally or nationally significant, as required under the FTAA.

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- However, the Economic Assessment also quantifies the benefits from avoided haulage costs (reductions in transport costs, social harm, and emissions) from supplying aggregate from within the region as opposed to from outside the region, and concludes that these alone are regionally significant (avoided costs estimated at \$663m to \$853m, depending on the location of the alternative source and the Hunua future production profile). I have been able to replicate much of the assessment and I agree that the scale of these benefits is likely to be regionally significant as required in criteria s22(1)(a) of FTAA.
- Additionally the Economic Assessment notes wider economic benefits, and I agree that there will be some. However, I consider that most of these benefits are likely to be small, and the Economic Assessment has not provided evidence to support them being important or significant.
- The Economic Assessment does not quantify costs, instead relying on other technical experts to address potential adverse effects (including noise, dust, environmental impacts, and other externalities). It is noted that approximately 38 dwellings are located in close proximity to the site and may experience some level of impact, with mitigation measures proposed to minimise these effects. While it would be feasible to quantify these costs using economic methods, it is likely that such costs would be relatively small and unlikely to be out of proportion to the regional benefits identified. Therefore, in my opinion, they are unlikely to meet the threshold for declining the project under s85(3)(b) of the FTAA.
- In conclusion, the methodology has been updated to address most of the issues raised in my previous reviews. While the total quantified benefits have reduced in the final assessment, they remain regionally significant. Based on the information available, it is likely that the benefits of the proposal would substantially exceed its costs. Taken together, these factors indicate that the proposal is consistent with the purpose of the FTAA, and I therefore support the development on economic grounds.

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4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Economic Assessment Response Updated - Market Economics, 22 May 2026.
- Appendix B12.4.4: Economic Assessment - Market Economics, 27 March 2026.
- Appendix B: Hunua Quarry – Winstone Aggregates High Level Assessment of Economic Affects for Fast-track Approval – Market Economics, 3 May 2024.
- Assessment of Environmental Effects - Boffa Miskell Limited, 30 March 2026.
- Appendix B12.4.1: Air Quality Assessment - PDP, March 2026.
- Appendix B12.4.5: Ecological Assessment - Boffa Miskell Limited, 28 March 2026.
- Appendix B12.4.11: Acoustics and Vibration Assessment - Styles Group, 23 March 2026.
- Appendix B12.4.12: Hunua Quarry Expansion Resource Report - Winstone Aggregates, 26 March 2026.
- Appendix B12.4.14: Transportation Assessment - Commute, 26 March 2026.

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

Nil.

6.0 Specialist Assessment

Economic Outcomes

This review focuses on the updated Market Economics report *Economic Assessment Response Updated (Economic Assessment)* which covers the economic issues associated with the proposed quarry (**Hunua Quarry Expansion**). For ease of comparison, this response follows the same structure as the Economic Assessment. Where relevant, this response also references information contained within other technical expert assessments and the Assessment of Environmental Effects (AEE).

In summary, I consider that the Hunua Quarry Expansion is likely to result in a net positive economic outcome if approved under the FTAA process. In relation to the FTAA requirements, I consider that the proposal will likely be regionally significant due to the scale of benefits associated with the avoidance of transporting aggregates into the Auckland region, which is likely to be material in the regional context.

While the applicant's economist agrees with my view that certain components of the project such as the quarry construction, operation and wider benefits are not regionally significant when considered in isolation, there is agreement that the development is likely to be regionally significant when assessed as an integrated whole.

1. Market Context (Section 3)

Broadly, I agree with the points raised in the Market Context section of the Economic Assessment. Aggregate demand is primarily driven by construction activity, including roads, infrastructure, and residential, commercial, and industrial development. Moreover, aggregate is largely non-substitutable and has a low value-to-weight ratio, meaning that transport distance is a key determinant of its total cost and consumption patterns.

The supply of aggregate is relatively inelastic in the short to medium term, as new resources can take time to develop, including land acquisition, resource consenting, extraction equipment, and processing facilities.¹ There are a limited number of suppliers in the Auckland region, which suggests that demand may exceed regional supply, with aggregate potentially being imported from regions such as Northland and Waikato. Hunua Quarry has been a major supplier of aggregate over the last 100 years and the quarry is proximate to southern growth areas and SH1. That accessibility is a strong positive feature of the proposal.

2. Aggregate Demand and Supply (Section 4)

The Economic Assessment outlines the available supply and demand data for aggregate, as well as known limitations in the underlying data. It estimates supply across the upper North Island and New Zealand, while accounting for a "known undercount". It identifies the primary drivers of demand as construction activity, including new housing, infrastructure investment and renewals, and commercial and industrial development. It also presents supporting data, including residential building consents and government infrastructure investment.

¹ The Economic Assessment correctly notes that there have been a number of other recent consents that have increased aggregate supply in Auckland (Brookby, Sutton Block Expansion, and Kings Quarry Stage 2). These consents were granted via various Fast Track processes, and therefore do not undermine the proposition that supply is relatively inelastic.

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The Economic Assessment then estimates future demand and supply as follows:

- Demand is estimated by applying an assumed per capita consumption rate of 9.1 tonnes to the medium and high Stats NZ population projections; and
- Supply is estimated based on 2025 supply levels, plus recently consented capacity.

On this basis, the assessment indicates a potential supply shortfall both currently and in the future, ranging from approximately 1.2-1.7m tonnes in 2026 to 6.2-9m tonnes by 2055. The Economic Assessment notes that this gap will be met through imports from neighbouring regions, principally Waikato. The assessment also notes that the regional differences in price of aggregate and the recent steps by Auckland quarry owners to progress applications to increase capacity signal that there is a shortfall and hence a need for more supply.

First, I agree that there are limitations associated with the available data, which make robust assessment of aggregate supply and demand challenging. In particular, it is not possible to definitively determine whether a supply shortfall exists in the Auckland region, the extent of any such shortfall, or the source and scale of aggregate imports.

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Second, I agree that there are three primary drivers of aggregate demand: new housing, infrastructure investment and renewals, and commercial and industrial development. Furthermore, the Waka Kotahi (2022) study² of aggregate supply and demand in New Zealand, which is directly referenced in the Economic Assessment, indicates that demand is more appropriately modelled using growth-based metrics, such as road investment expenditure, population growth rates, and GDP.

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However, the Economic Assessment utilises total population as the basis for estimating demand, despite acknowledging elsewhere that aggregate demand is closely linked to growth-related activity and providing growth related data (building consents, infrastructure spend). The use of a per capita approach risks overstating demand associated with the existing population, while understating demand arising from growth. Overall, the assessment is primarily driven by level-based indicators (i.e. total population) rather than change-based indicators (e.g. growth in population). This is because the majority of the projected future population (approximately two-thirds) comprises the existing population, which has a relatively limited influence on incremental aggregate demand. In contrast, growth is a smaller share of the population, but accounts for a disproportionate share of demand, as it drives new housing, infrastructure, and associated construction activity. The level-based assumption of 9.1 tonnes per capita is not supported by evidence in the assessment or the literature.

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Furthermore, I note that the Economic Assessment does not utilise the product mix data provided in the application. Importantly, output from Hunua Quarry, and the projected resource from the expansion, is used predominantly for roading purposes (approximately 73% and 75%, respectively).³ The nature of the resource therefore suggests that only a relatively small proportion is associated with residential construction (approximately 15%). Accordingly, demand for aggregate from the Hunua Quarry Expansion is likely to be more closely linked to infrastructure investment than to residential development, although infrastructure investment is to some extent driven by population growth. This distinction has not been explicitly incorporated into the demand projections presented in the Economic Assessment.

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I consider that there is a high probability that demand is not well represented by the per capita assumption used in the Economic Assessment. As a result, actual demand may be either higher or lower than estimated in the Economic Assessment, with corresponding implications for the magnitude of the regional shortfall. However, I acknowledge that other indicators, such as price signals and revealed preferences, suggest that a supply shortfall may exist.

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Furthermore, I accept the applicant's economist's position, as raised during the second engagement meeting, that it would be difficult to reliably establish demand based on a list of major infrastructure, roading, or housing development projects. I also acknowledge that, although the product mix data presented in the application is largely based on product for roading projects, the aggregate produced could potentially be used across a range of alternative construction and infrastructure applications.

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Third, I have not undertaken a detailed review of the supply estimates and therefore I accept that the Economic Assessment has relied on the best available data, including information from recently granted consents. I also accept that some aggregate may be imported into the Auckland region.

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3. Economic Effects of the Project (Section 5)

The Economic Assessment sets out a baseline counterfactual and three alternative scenarios to assess the economic benefits of the Hunua Quarry Expansion (on-site, benefits of avoided haulage, and wider benefits). This framework enables the identification of both gross benefits and net benefits, with the latter measured relative to the baseline counterfactual. In Section 5, the following scenarios are adopted:

- **Counterfactual:** Hunua Quarry is assumed to produce 2.7m tonnes each year until 2039, when the existing resource consent expires. Thereafter, no further production and the market is assumed to import an equivalent volume of aggregate from outside the region.
- **Alternatives:** three production scenarios are defined (Low, Mid, and High) and are described as conservative. The Low scenario assumes a modest increase in production to 2.8m tonnes per annum, representing approximately a 3% increase on current production. The High scenario assumes a "modest step increase on historic levels", with production reaching 3.66m tonnes per annum, representing an increase of approximately 35%. The Mid scenario assumes a production level between the Low and High scenarios.

The report assumes that a total production of 225m tonnes over 80 year period could be produced, which is consistent with the applicant's assessment of the resource.⁴

The Economic Assessment identifies Hunua Quarry as a significant economic entity and estimates the on-site operational and construction activity associated with the proposed expansion (subsection 5.3). Under the counterfactual, current operations are assumed to continue until 2039, when the existing resource consent expires. Under the alternative scenarios, operations are assumed to continue beyond 2039, with a modest increase in production. This is consistent with other material in the application, "there would be about a 10% increase in staff, more automation would also be brought in over time so the numbers would be near static"⁵. In addition, a small amount of construction activity is assumed to occur each year as the resource is progressively developed.

The update assessment now adopts a commercial discount rate of 8%, and estimates an increase in activity (associated with the Hunua Quarry Expansion) to be an average GDP of \$1.7m per annum in the Auckland region

² Wilson, D., Sharp, B., Sheng, M. S., Sreenivasan, A., Kieu, M., & Ivory, V. (2022). Aggregate supply and demand in New Zealand (Waka Kotahi NZ Transport Agency research report 693).

³ Appendix B12.4.14: Transportation Assessment - Commute (Figure 7 Increase in Quarry Production and Truck Movements).

⁴ Appendix B12.4.12: Hunua Quarry Expansion Resource Report - Winstone Aggregates (page 12).

⁵ Appendix B12.4.14: Transportation Assessment – Commute (page 11).

(equivalent to \$132m over an 80-year period). This is estimated to support approximately 80 jobs per year, or around 6,219 job-years over the same period.

The Economic Assessment then quantifies the benefits associated with avoided haulage (subsection 5.4). The key assumption is that, in the absence of the Hunua Quarry Expansion, aggregate would be sourced from outside the region, resulting in longer transport distances and therefore higher transportation costs, as well as increased social harm, and air emissions. These effects are generally estimated using standard metrics drawn from government transport policy appraisal guidelines, and a 5% discount rate is applied. The primary assumptions not directly derived from publicly available data relate to the transport cost per tonne-kilometre, estimated at \$0.38–\$0.55, and the delivery locations (East Tāmaki, Penrose, Papakura, and Drury).

Subsection 5.5 presents a separate calculation of the gross output value of the aggregate, based on a total yield of 225m tonnes over the 80-year period, multiplied by an average price of \$24.12 per tonne. This results in an undiscounted total value of approximately \$5.4b over the period.

Subsection 5.6 provides an assessment of on-site efficiency gains arising from changes to the layout and elevation of the processing circuit, estimated at \$0.4m per annum over the 80 year period (i.e. PV of \$31m).

Finally, Subsection 5.7 provides a qualitative discussion of wider economic benefits, including supply chain resilience, increased competition in the market, continuity of supply, alignment with government policy, and the enabling role of aggregate supply for other sectors of the economy.

The assessment also concludes that there are no significant adverse economic effects, noting that approximately 38 dwellings are located in close proximity to the quarry and that mitigation measures are proposed to minimise potential impacts. It further relies on other technical experts to assess and address these costs.

First, I generally agree with the counterfactual and the three scenarios applied in the assessment. While there may be alternative sources of aggregate supply within the Auckland region, I consider it would be impractical for the applicant to assess all such options in detail. In addition, the scenarios and assessment extend over an 80-year period, whereas the regional consent period is 35 years. I agree with the focus on the longer-term horizon for analytical purposes, alongside the provision of results for the shorter consent period. I agree that the scenarios adopted are reasonable, and it is possible that quarry production could be higher if demand increases, meaning that the associated assessment may be conservative, as described in the Economic Assessment.

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Second, I consider that the on-site operation and construction that will be enabled by Hunua Quarry Expansion will be relatively small and not significant at the regional or national level as required in s22(1)(a) of FTAA. The applicant's economist has agreed that this activity is not significant at the regional level, and has revised the Economic Assessment to record that operation and construction is not significant in the context of the FTAA requirements.

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Third, I have been able to replicate most of the results presented in the avoided haulage costs assessment and I broadly agree with the method applied. However, I note the following aspects that should be considered:

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- A discount rate of 5% is reasonable, as these avoided costs reflect public externalities that primarily accrue to parties not directly involved in the trade of aggregate.
- Transport cost assumptions applied (cost per tonne-kilometre of \$0.38–\$0.55) are higher than those reported in some of the literature. However, I agree that given current conditions including elevated diesel prices, these costs may be reasonable and potentially conservative. It would be beneficial if sensitivity testing in the Economic Assessment included a range of transport cost assumptions around the central value

adopted in the body of the report (which may be approximately $\pm 10\%$ of the current results). Action from engagement was that the applicant's economist would add short discussion about impact of benefits with a different price, which was included for higher prices. Also to include sensitivity results in the appendix, which was not actioned. I consider that it would have been informative to include both lower and higher price scenarios within the sensitivity testing. It is likely that adoption of a lower fuel price assumption would have reduced the estimated benefits, however the benefits may well still be of regional significance. Including a lower-bound scenario would provide greater assurance to decision-makers that the overall findings of the assessment are not unduly sensitive to this key assumption.

- Truck load weight is assumed to be 30 tonnes which is lower than the actual value (2023 of 40 tonnes) and anticipated (35 tonnes), as reported in the transport assessment.⁶ If the actual or anticipated loads were applied then avoided costs decrease by 2% to 4%. The applicant's economist has undertaken new sensitivity assessment and confirmed that higher (or lower) truck loading assumptions would result in only minor changes to travel costs which match my estimations. This new finding in the revised report is consistent with and supports, my proposition that the assessment results are not materially sensitive to the truck loading assumptions adopted.
- Delivery locations are set as East Tāmaki, Penrose, Papakura, and Drury based on "recent history". I am unable to verify the reasonableness of this assumption or the proportional allocation of demand used in the Economic Assessment. However, I note that most of Auckland is closer to Hunua Quarry than to either Maungaturoto Quarry or Smythes Quarry, which means that alternative delivery location assumptions would still generally result in reduced haulage distances and associated avoided transport costs. This conclusion would only change materially if a significant share of demand were located north of Silverdale, which in my view is unlikely.
- Social costs in the previous report were not calculated consistently. These calculations have since been revised, and the results presented in the updated report align with my expectations.
- The emissions cost calculations in the previous report could not be fully replicated using the information provided. The applicant's economist subsequently including the assumptions used, supplied the underlying model and workings for review. Following that review, several corrections were made, and I am satisfied that the revised results now reflect my expectations.

I consider the approach to be reasonable and overall magnitude of the estimated benefits are likely to be regionally significant.

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Fourth, the previous Economic Assessment incorrectly estimated the gross output value of the resource as being worth \$6.4b. In the revised report, the total resource is updated to 225 million tonnes, which is now consistent with the resource report⁷, and gives a value of \$5.4b. Moreover, the applicant's economist has acknowledged that this is a hypothetical value, as it would be physically unachievable to extract this resource in one year and impossible to find enough customers to sell this volume on the market.

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Moreover, the applicant's economist has confirmed that the total resource of 255 million tonnes includes the resource currently authorised under the existing consent and has provided the data used to estimate its value. It is incorrect to include the value of resource that can be extracted under the existing consent, as this overstates the value attributable to the FTAA approval. Based on the applicant's own data, the value of the currently consented

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⁶ Appendix B12.4.14: Transportation Assessment - Commute (Figure 7 Increase in Quarry Production and Truck Movements).

⁷ Appendix B12.4.12: Hunua Quarry Expansion Resource Report - Winstone Aggregates (page 12).

resource is \$777.8m. This amount should therefore be excluded from the assessment, as this resource can be extracted regardless of the outcome of the FTAA application.

Therefore, the value needs to be discounted to account for the fact that the resource can only be extracted and sold to customers over time and the existing resource should not be counted as it can be extracted regardless of the FTAA application. I have used the data provided by the applicant's economist and applied a discount rate of 8%, which is appropriate for a purely commercial activity such as the aggregate sale by a private operator. This results in a gross output present value of approximately \$365m under the mid scenario.

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That is substantially lower (by approximately 93%) than the reported value of \$5.4b, which is important given that this figure is a key result referenced in the conclusion, executive summary, and the AEE. Critically, the applicant's economist has agreed and revised the report to acknowledge that this value is **already captured** within the operational assessment, which includes gross output. As such, this subsection effectively **double counts** the same benefit and should not be considered as a separate benefit.

Fifth, the on-site efficiency gains arising from changes to the layout and elevation of the processing circuit represent a private benefit and, at \$0.4m per annum, are relatively modest. I consider that these benefits should already be captured within the operational assessment, and their separate inclusion does not add value to the understanding of the projects benefits, and risks double counting. The applicant's economist has agreed and revised the report to acknowledge this benefit is already included in the operational assessment.

Finally, the Economic Assessment does not quantify the potential costs associated with the Hunua Quarry Expansion. While it acknowledges that there are 38 dwellings in close proximity that may be affected by noise, dust, and vehicle movements, and that there may be environmental effects, these impacts are not quantified.

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In my view, it would be relatively straightforward to quantify at least some of these externalities using established metrics from government transport appraisal guidance (for example, noise effects from site operations and associated traffic relative to nearby sensitive receptors). Similarly, ecological impacts could be estimated using values derived from existing research (e.g. contingent valuation and other stated preference methods). Notwithstanding this, given the relatively small number of affected dwellings (38) and the limited area of land involved (44.6 hectares), together with proposed mitigation measures, I would expect that quantified costs would be modest and unlikely to outweigh the estimated benefits.

4. Statutory assessment (Section 6)

The Economic Assessment concludes that the Hunua Quarry Expansion delivers significant regional economic benefits to Auckland (as required in the FTAA 2024), primarily through avoided haulage (transport, emissions, and social costs) associated with sourcing aggregate from more distant locations such as Waikato and Northland. These avoided costs are material at a regional scale and are likely conservative, as the absence of Hunua Quarry would increase construction and infrastructure costs due to reliance on more remote supply. The Project also aligns with the Government's growth and infrastructure objectives and contributes positively to climate change mitigation by reducing haul distances, fuel use, and associated emissions over the life of the consent.

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I agree that Hunua Quarry Expansion is likely to deliver significant regional economic benefits from the avoided haulage, which is consistent with the FTAA requirement. I note that the Economic Assessment does not mention the other benefits, and the implication is that those other benefits are not by themselves regionally significant. I agree

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that those other benefits (i.e. on-site operation, quarry construction, and other wider benefits), by themselves are unlikely to be regionally significant, but I acknowledge that they will be positive.

The Economic Assessment does not provide an explicit conclusion in relation to s85(3)(b) of the FTAA as to whether costs are out of proportion to the regional benefits. This is likely because the Economic Assessment did not quantify the potential costs, instead relying on separate technical reports to address adverse effects such as noise, dust, environmental impacts, and other externalities. While it would be feasible to quantify these costs using standard economic valuation methods, it is expected that such costs would be relatively small in scale and unlikely to be disproportionate to the regional benefits identified. On this basis, in my opinion, the Hunua Quarry Expansion would not be likely to meet the threshold for decline under s85(3)(b) of the FTAA.

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5. Conclusion (Section 7)

I generally agree with the conclusions set out in the Economic Assessment, except where I have identified differences in this review. Broadly, while I do not agree with every aspect of the methodology adopted, I consider that the Hunua Quarry Expansion would likely generate regionally significant economic benefit (s22(1)(a) of FTAA). I also consider it likely that if the economic costs were fully quantified they would be smaller than the estimated benefits. On this basis, the overall economic outcome would be positive for the community and wider society (s85(3)(b) of FTAA).

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7.0 Section 67 Information Gap

No information gaps have been identified.

8.0 Recommendation

The application would be more complete if the applicant had quantified the costs and compared them to the benefits of the proposal through a cost–benefit analysis. This would enable decision-makers to have greater confidence that all relevant impacts have been systematically identified and assessed, and that the proposal would deliver a positive outcome for the region.

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9.0 Proposed Conditions

The proposed conditions of consent are not within the scope of my assessment, and I therefore make no comment on them.

10.0 Supporting Documents

Detail is provided in the footnotes to Section 6.0 of this memo.

Technical Specialist Memo – Policy Planning

To: Emma Chandler – Lead Planner & Warwick Pascoe - PPL

From: Matt Gouge, Senior Policy Planner – Central and South Planning Team 1

Qualifications
& Relevant
Experience:

I hold the qualification(s) of: Bachelor of Science, Post Graduate Diploma in Environmental Planning, and Master of Resource and Environmental Planning, and have 15 years experience working in environmental science including ten years in Auckland Council Policy Planning.

I am an intermediate member of the New Zealand Planning Institute. I have prepared planning evaluations and evidence for resource consent applications, notices of requirement for designation and fast-track applications.

Preparation in
Accordance
with the Code
of Conduct:

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses ([Code](#)) and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Date: 18 June 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name: Hunua Quarry

Fast-Track application number: FTAA-2603-1185 (Council Reference BUN60464053)

Site address: 489 Hunua Road, Hunua

2.0 Executive Summary / Principal Issues

This memo provides a brief policy review of the proposed expansion of the Hunua Quarry pit and concludes that, overall, the application is consistent with the relevant National Policy Statements and relevant objectives and policies of the Auckland Unitary Plan.

There are focus areas identified for the assessment which is guided by the relevant policies. These relate to application of the Effects Management Hierarchy, consideration of Māori cultural associations, and the management of potential future reverse sensitivity effects.

3.0 Documents Reviewed

- *Assessment of Environmental Effects and Application for Resource Consent – Hunua Quarry Development (AEE)* prepared by Boffa Miskell, dated 30 March 2026
- Appendix A6.7: *Iwi Engagement Report* prepared by JW Wakaira Consulting, dated March 2026
- Appendix B12.9: *Relevant Objectives, Policies and Statutory Assessment*, n.d.
- Appendix B12.4.5a *Ecological Assessment* prepared by Boffa Miskell, dated 28 March 2026

4.0 Additional Reasons for Consent Not included in AEE

N/A

5.0 Specialist Assessment

Proposed works

The AEE has detailed that the Fast-track resource consent application for the expansion of the Hunua Quarry Symonds Hill pit is to involve the expansion of the pit by approximately 50 hectares to a full pit extent of 100 hectares, to be progressed in eight indicative stages over 50–80 years.

Assessment

The request is for a brief policy review of the proposal, notably with respect to the expansion of the quarry into areas of Outstanding Natural Landscape, the Rural – Mixed Rural Zone and in relation to the National Policy Statement: Infrastructure.

By extension, I also have also included advice from our policy specialists on the National Policy Statements for Freshwater Management and Indigenous Biodiversity.

National Policy Statements (NPS)

With reference to Appendix B12.9¹ of the application, I agree with the applicant that the relevant NPS are those on Infrastructure (2025), Freshwater Management 2020 (amended 2025), and Indigenous Biodiversity 2023 (amended 2025). The NPS for Urban Development and the New Zealand Coastal Policy Statement are not assessed as they are not considered substantive to the application. The subject site is not in either the urban environment or in the coastal environment.

NPS – Infrastructure

The purpose of this NPS is to ensure the national, regional and local benefits of infrastructure are recognised and provided for. In this case, the quarry comes under the definition of an ‘infrastructure supporting activity’ which has specific policy direction in the NPS-I.

Policy 2 sets out an inclusive set of tests for assessing the operational and functional needs for infrastructure to be located in particular locations or environments. This is useful for considering the operational and functional needs of the infrastructure supporting activity under Policy 5.

National Planning Standards were released on 5 April 2019 and came into effect on 3 May 2019. They seek to reduce the variety and complexity of policy statements, regional plans, and district plans across the country. The standards are yet to be incorporated into the AUP², however it is notable that a definition of ‘functional need’ and ‘operational need’ occurs in the standards:

- *(Functional Need) means the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment.*
- *(Operational Need) means the need for a proposal or activity to traverse, locate or operate in a particular environment because of technical, logistical or operational characteristics or constraints.*

The test for operational and functional need is also relevant to the NPS-FM and NPS-IB with all relevant NPS being considered together, as opposed to one NPS taking precedence over another. In my view, the proposal meets the tests for functional and operational need to be undertaken in the proposed location.

Appendix B12.9 correctly identifies Policy 5 as the most relevant policy applying to the quarry expansion. It sets out the case where the quarry can be considered regionally significant in terms of aggregate extraction (3 million tonnes between 2024 and 2025). It also sets out rationale applicable to an operational and functional need (close proximity to market allowing (cost) effective supply to support infrastructure services to people and communities).

Although not commented on in the Appendix, Policy 6 is also relevant to infrastructure supporting activities. This policy directs recognising and providing for Māori interests.

¹ Relevant Objectives, Policies and Statutory Assessment

² Unitary Authorities have 10 years to adopt the planning standards from the date they came into effect on 3 May 2019.

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Appendix A6.7 of the application addresses Iwi Engagement and is comprehensive in coverage and detail, having been undertaken by a reputable practitioner.

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The application states that the applicant continues to have an ongoing relationship with those mana whenua groups with interests covering the subject site. The application claims that design concessions have been made, and management plans developed in response to iwi concerns and aspirations.

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Without a detailed analysis of the relevant material, the proposal is understood to have responded to Policy 6. It is recommended this is made explicit in Appendix B12.9.

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NPS – Freshwater Management

Auckland Council's freshwater policy specialist has reviewed the application and concurs that Appendix B12.9 Table 3 has been correctly applied in regard to how the NPS-FM applies to this proposal. In particular, he agrees the Resource Management (Freshwater and Other Matters) Amendment Act 2024 removes the requirement to consider the hierarchy of obligations contained in clauses 1.3(5) and 2.1 of the NPS-FM from resource consent applications, and resource consent decisions.

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In his view, Policy 3 should require an assessment of the effects of the activity, including (but not limited to) the loss of freshwater features and the generation of sediment associated with the quarrying activity on the catchment as a whole. This is as opposed to the applicant's stated position that the policies (3 to 5) are directed at a higher level than the scale of the proposal.

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Auckland Council's specialist concurs with the referencing of Section 3.22, provided the application can be demonstrated as being of regional or national benefit, and that there is a functional or operational need for the activity to be done in that location.

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The application of the Effects Management Hierarchy (EMH) is appropriate and consistent with the policy direction of the NPS-FM, however the extent to which the offsetting and compensation proposed through the EMH considers the 'loss of potential value' (section 3.21) of the wetlands and rivers is a matter for the consideration of council's ecologist. From the reading of the freshwater policy specialist's views, the effects of the activity are proposed to be managed via offsetting and compensation via riparian planting, thereby addressing value. It doesn't appear the *extent of the loss* is addressed in the proposed approach.

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The NPS-FM also has several appendices, and of particular relevance to this proposal are Appendix 6 – Principles for aquatic offsetting and Appendix 7 – Principles for aquatic compensation. These principles have been addressed in Appendix B12.4.5 of the application.

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The council freshwater policy specialist anticipates as part of council's ecological assessment that the ecologist will assess whether the offsetting/compensation will meet these principles.

Focus could be given to item 7 of both Appendices 6 and 7. The applicant in Appendix B12.4.5b refers to this principle being satisfied, considering available sites.

In the council specialist's view, consideration should be given to what level of assessment was undertaken to determine what an *available site* is. Was it limited to sites under the control and/or

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ownership of the applicant or were other matters considered and if not, why not? This will be an important consideration if there is concern over the extent of offsetting and compensation being proposed.

NPS – Indigenous Biodiversity

The NPS-IB seeks to maintain indigenous biodiversity across Aotearoa New Zealand so there is at least no overall loss in such biodiversity. It applies to the terrestrial environment and is relevant as the proposal is seeking to remove scheduled Significant Ecological Areas (deemed Significant Natural Areas in the NPS), including draining up to nine natural inland wetlands located within the SEA. While council is required to give effect to the NPS-IB as soon as is reasonably practicable, it has five years from commencement to make the necessary changes to the AUP (August 2028).

The policy specialist for the NPS-IB has reviewed the proposal and provides the following comments:

- *The assessment acknowledges that not all IB on the subject site will be protected or maintained, however, overall there will be no net loss (and the aim is for an overall net gain) in biodiversity as a result of this project.*
- *The proposal relies on application of the effects management hierarchy (EMH) to manage adverse effects of the proposal (under cl 3.10(3)&(4)), particularly through the pathway provided for quarrying activities under cl 3.11.*
- *Managing the proposal in accordance with the specific clauses of the NPS-IB, including the EMH, is an appropriate approach to meet the objective of the NPS-IB. Application of the EMH is discussed further below.*
- *I generally concur with the assessment of policies, albeit noting that:*
- *I have not reviewed the details of mana whenua engagement.*
- *With regards to Policy 4 – the assessment does not make a clear connection to climate change. I defer to the council ecologist to consider the resilience of the proposed mitigation and offset.*
- *Policy 9 – I do not consider Policy 9 particularly relevant to the proposal. The proposal does not meet or rely on related clause 3.15(2) for established activities.*

Specifically with respect to the proposal's alignment with Clause 3.10/3.11/ EMH, the specialist notes that while the NPS-IB specifies that certain adverse effects must be avoided on an SNA (cl 3.10(2)), exceptions are provided for quarrying activities under cl 3.11(1).

These exceptions are where the activity has significant regional or national benefit, have a functional or operational need to be in that particular location, and have no practicable alternative locations. Assuming these tests can be met, adverse effects on the SNA must be managed by applying the EMH.

The applicant must demonstrate how each step of the hierarchy will be applied, and that the appropriate principles in Appendix 3 and 4 have been complied with or given regard to. The specialist goes on to state:

- *The Assessment of Ecological Effects sequentially discusses application of the EMH. The assessment notes that "Avoidance of impact on indigenous vegetation, riparian areas and streams, and wetlands is provided to some extent through project design" but no further detail is provided on how the design has considered avoiding vegetation removal.*

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- *Discussion is provided on how other adverse effects on terrestrial IB (such as on lizards, bird and bats) will be avoided where practicable, then minimised and remedied. Offsetting is proposed to address residual adverse effects, as well as compensation to address shortfalls in the offsetting. A summary table is provided on pages 6 and 7. The applicant has generally demonstrated how each step of the EMH will sequentially be applied, except for limited discussion on the effort to avoid indigenous vegetation removal in the first place. I rely on council's ecologist to consider the suitability of the actions proposed, including whether all of the specific adverse effects listed in cl3.10(2) of the NPS-IB have been considered.*
- *The applicant has assessed each of the biodiversity offsetting and compensation principles in tables 23 and 24. Provided council's ecologist concurs with the assessment, I am satisfied that the applicant has addressed this requirement of the NPS-IB to demonstrate how the principles have been applied.*
- *Other considerations*
The proposal involves the removal of 4.15 ha of exotic scrub. The NPS-IB is relevant to the management of indigenous biodiversity and so is concerned with the loss of exotic scrub to the extent that it impacts IB, such as through loss of habitat for indigenous species. The NPS-IB requires that significant adverse effects on IB outside SNAs must be managed in accordance with the EMH. I defer to the council's ecologist to consider whether this has appropriately been factored into the ecological assessment.

Other Relevant Policies

Zoning

The proposed quarry expansion extends over the AUP's Special Purpose Quarry Zone and Rural – Mixed Rural Zone.

The Special Purpose Quarry Zone provides for significant mineral extraction activities and is the preferred AUP zoning for established quarries. It enables the efficient operation of mineral extraction activities whilst also seeking to enable compatible land uses within and adjoining the zone. Significant adverse effects on scheduled natural heritage are to be avoided where possible, or otherwise remedied or mitigated. The proposal is consistent with these provisions.

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The Rural – Mixed Rural Zone seeks to accommodate *rural production activities* and associated non-residential activities whilst also ensuring good amenity levels for residents that use their land for rural lifestyle purposes.

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Rural production activities are defined in the AUP as '*Activities that involve the production of primary products such as those from farming, intensive farming, horticultural, or forestry activities, and which have a functional need for a rural location.*'

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The National Planning Standards define primary production to include quarrying. As remarked earlier, the standards have yet to be incorporated into the AUP, however 'mineral extraction activities' are considered to meet the common definition of the 'production of primary products' and are therefore anticipated in the zone.

Mineral extraction activities are identified as being typical features of the Rural – Mixed Rural Zone (Policy H19.2.4(2)), recognising that they generally do not result in reverse sensitivity issues within the zone. This is also recognised in the activity status of mineral extraction activities, being a Discretionary Activity in the Rural Production and Mixed Rural zones whereas they are Non-Complying Activities in all other Rural zones.

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Ideally, the application would occur in tandem with a proposed rezoning of the affected area of Mixed Rural Zone to the Special Purpose Quarry Zone, and also the application of the Quarry Buffer Area Overlay. This is to avoid future potential reverse sensitivity effects on the quarry operation.

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This outcome, however, is not possible under a Fast Track Approvals Process and should be addressed during the review of the AUP (or through new plans developed under legislation which succeeds the RMA).

In the interim, the application states that Winstone has purchased surrounding properties to minimise such future effects. It is assumed that should these properties be sold in the future by the applicant, legal mechanisms will be applied to avoid or minimise the potential of reverse sensitivity effects on the quarry operation. This approach is consistent with the policy direction applying to enabling mineral extraction activities.

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ONL and SEA

Other key chapters of the AUP which are engaged by this proposal are those that relate to Outstanding Natural Landscapes (ONL) (Chapters B4 and D10) and Significant Ecological Areas (Chapters B7 and D9). Significant Ecological Areas policy has been addressed at a national level earlier in this memo through discussion of the NPS-IB, which the council is required to give effect to as soon as is practicable. The following assessment focusses on the ONL.

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The application addressed the ONL policies in the AUP from page 21 and again at page 61 of Appendix B12.9 of the application. The quarry extension will intrude 6ha into the northeast portion of the ONL, identified as Area 60 Ponga Road.

The application states that the development does not diminish the defining values of the ONL, which include its elevated ridges and extensive indigenous forests. It is also stated that there is a temporal aspect to these effects, where the quarry will be progressively rehabilitated (over its 80-year life) as extraction is completed. Mana whenua groups have been actively engaged in the project and have influenced the proposal as has been discussed earlier.

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While the proposal is inconsistent with, or possibly contrary to directive policies seeking to avoid the adverse effects of inappropriate land use on the natural characteristics and qualities that contribute to the values of ONL, these are considered against a backdrop of other national and regional policies recognising the functional operational need for infrastructure supporting activities and which provides an effects management hierarchy for quarrying activities in sensitive natural environments.

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In my view, this provides a policy pathway for the approval of the application while recognising these policy tensions.

6.0 Section 67 Information Gap

The analysis has identified potential information gaps in the application of the Effects Management Hierarchy for the consideration of the reporting ecologist.

7.0 Recommendation

In my view, there is a policy pathway for the approval of the application.

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8.0 Proposed Conditions

N/A

4 August 2026

Warwick Pascoe
Principal Project Lead, Auckland Council


Dear Warwick,

Hunua Quarry Development Fast-track Substantive Application
489 Hunua Road, Hunua

Introduction

1. Watercare Services Limited (**Watercare**) welcomes the opportunity to provide comments on the Hunua Quarry Development Fast-track substantive application (**Application**), made under section 53 of the Fast-track Approvals Act 2024 (**Act**).
2. Winstone Aggregates (a division of Fletcher Concrete and Infrastructure Limited) (**Applicant**) proposes works at 489 Hunua Road, Hunua (**Project Area**) to expand and deepen the existing Symonds Hill Pit at Hunua Quarry to provide access to additional greywacke aggregate resource and support continued aggregate supply to the Auckland Region (the **Project**).
3. The zoning of the Project Area is Special Purpose – Quarry Zone and Rural – Mixed Rural Zone under the Auckland Unitary Plan – Operative in Part (**AUP-OP**).
4. Watercare's comments in this letter are based on the Application as at today's date, in particular the following lodged Application documents:
 - *Hunua Quarry Development Part B – Assessment of Environmental Effects and Application for Resource Consent – Dated 22 June 2026*
 - *Appendix A6.4 – Consultation Summary Report*
 - *Appendix B12.7 – Conditions*
 - *Appendix B12.8.12 – Groundwater Monitoring and Contingency Plan*
5. Any amendment to the Application will require further review from Watercare.

Watercare's purpose and statutory obligations

6. Watercare is New Zealand's largest provider of water and wastewater services, operating as a substantive council-controlled organisation owned by Auckland Council with the purpose embodied in the Māori whakatauki "*Ki te ora te wai, ka ora te whenua, ka ora te tangata*" (When the water is healthy, the land and the people are healthy), reflecting the connection between its services and the wellbeing of the community and local environment.
7. Watercare is required to manage its operations efficiently, with a focus on minimising overall costs while maintaining long-term asset integrity. These obligations are subject to economic regulation

under the Watercare Charter, with oversight provided by the Commerce Commission as the appointed Crown monitor.

8. Under the Local Government (Water Services) Act 2025, Watercare must provide quality water services that are reliable and resilient and meet all regulatory requirements, including providing drinking water that is safe for consumers. Watercare is also required to use water resources efficiently when providing drinking water services.
9. The Water Services Act 2021 establishes the regulatory framework for drinking water suppliers and requires Watercare to maintain drinking water safety plans, comply with drinking water standards, and identify, manage and monitor risks to source water.

Watercare's comments

10. Watercare has considered the Application having regard to its role as Auckland's water and wastewater service provider, and in particular its responsibility to protect existing water supply assets, source water interests and the long-term resilience of Auckland's public water supply network.
11. Watercare operates the Hays Creek Dam, which forms part of Auckland's water supply network. The Hays Creek Dam contributes a comparatively small part of Auckland's total water consumption; however, it also represents a critical and vital part of the wider water supply network and 55,000 people rely on drinking water from the catchment. There has been significant capital investment in the Papakura Water Treatment Plant (**WTP**) over the last 10 years. The Papakura WTP abstracts raw untreated water from the Hays Creek Dam.
12. Watercare is responsible for managing and operating the region's public water supply and ensuring water supply resilience. In accordance with the Water Services Act 2021, Watercare is also legally obligated to ensure that clean and safe potable water supply is provided for Auckland.
13. The Hays Creek Dam is located upstream of the Project. While the Project is located outside the Hays Creek water supply catchment, Watercare has considered the potential effects of groundwater drawdown and changes in the stream baseflow on its water supply interests.
14. Based on the location of the Project, the supporting assessments and the proposed conditions, Watercare agrees that the dewatering associated with the Project is unlikely to have any effect on the Hays Creek Dam.
15. Condition 214 proposed in the Application is generally supported by Watercare subject to amendments set out below.

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Comments on proposed conditions

16. Watercare proposes the following amendments to condition 214 and requests the inclusion of an additional monitoring reporting condition.

214. If Watercare Services Limited (WSL) notifies the Consent Holder and the Council that either WSL's or the Consent Holder's monitoring indicates that the drawdown authorised by this consent is having a potential adverse effect on the dam structure, the yield from the reservoir, or the stream flows, the Consent Holder must, within one month, commission an independent expert mutually agreed with WSL to review the relevant monitoring data, and, if the expert considers it necessary, procure further data, to enable a report to be prepared by the expert forthwith. The report is to state whether or not the potential adverse effects at WSL's facilities or the variations in WSL's or the Consent Holder's monitoring information are a result of the dewatering authorised by this consent. If the report states that the dewatering is:

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(i) not causing the adverse effect or not causing the variation in monitoring information, no further action will be required of the Consent Holder; or

(ii) likely to be causing the adverse effect or causing the variation in monitoring information, the Consent Holder must, in consultation with the Council and WSL, identify options for avoiding, remedying or mitigating the potential adverse effects, and implement the method that represents the best practicable option for doing so, with all costs associated with the investigation, assessment, monitoring, mitigation and implementation of any required measures to be met by the Consent Holder.

(a) The Consent Holder shall provide WSL with copies of monitoring reports prepared in relation to Condition 214 at the same time as they are submitted to Auckland Council.

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Conclusion

17. Watercare recognises the importance of quarry infrastructure to Auckland's growth and infrastructure delivery. Watercare's primary interest is ensuring that the Project does not adversely affect Watercare assets, water resources, source water interests or public water supply.
18. Based on the information reviewed, Watercare agrees that the Project is unlikely to have any effect on the Hays Creek Dam.
19. Watercare remains available to discuss these matters further.

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Yours faithfully,



Sharon Danks
Head of Water
Watercare Services Limited

Address for correspondence:

Chloe Jacobs

Development Planner

Phone:



Email: fasttrack@water.co.nz

Technical Specialist Memo – Contaminated land

To:	Emma Chandler – Lead Planner & Warwick Pascoe - PPL
From:	Marie Meredith, Environmental Specialist - Contamination, Air & Noise Team
Qualifications & Relevant Experience:	I hold the qualification(s) of: Bachelor of Environmental Science, Master of Science, and have ten years' experience working in environmental science including four in contaminated land and air quality. I am a full member of the Australasian Land and Groundwater Association. I have prepared technical assessments for resource consent applications, notices of requirement for designation and fast-track applications.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (Code), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Date:	8 May 2026 , revised 30 July 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Hunua Quarry
Fast-Track application number:	FTAA-2603-1185 (Council Reference BUN60464053)
Site address:	489 Hunua Road, Hunua

2.0 Executive Summary / Principal Issues

This memo provides a review of contaminated land matters associated with the proposed expansion of the Hunua Quarry pit and concludes that, overall, the site presents a low risk to human health and the environment; and is suitable for the proposed commercial/industrial use.

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The following provides a summary of the areas of potential contamination, intrusive investigation findings, soil management requirements; and overall conclusions and recommendations with respect to the NES:CS and Chapter E30 of the AUP(OP). A recommendation is made regarding works completion reporting.

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3.0 Documents Reviewed

- *Assessment of Environmental Effects and Application for Resource Consent – Hunua Quarry Development* (AEE) prepared by Boffa Miskell, dated 30 March 2026
- Appendix B12.4.3: *Hunua Quarry Pit Development – Combined Preliminary & Detailed Site Investigation* (PSI & DSI) prepared by PDP Ltd, dated March 2026
- Appendix B12.8.8: *Quarry Management Plan* (QMP) prepared by Winstone Aggregates, dated March 2026
- Appendix B12.7: *Draft Conditions*
- Appendix B12.8.11: *Chemical Treatment Management Plan* (CTMP) prepared by Winstone Aggregates, dated March 2026

4.0 Additional Reasons for Consent Not included in AEE

There are no additional reasons for consent for contaminated land not included in the AEE

5.0 Specialist Assessment

Proposed works

The AEE has detailed that the Fast-track resource consent application for the expansion of the Hunua Quarry Symonds Hill pit is to involve the expansion of the pit by approximately 50 hectares to a full pit extent of 100 hectares, to be progressed in eight indicative stages over 50–80 years.

Summary of Preliminary and Detailed Site Investigation and Soil Management Recommendations

A PSI & DSI is submitted as part of this application to assess the soil contamination profile of the site. This PSI & DSI was prepared by Pattle Delamore Partners Ltd in March 2026. It is stated to have been prepared by a Suitably Qualified and Experienced Practitioner (SQEP) in general accordance with the requirements of the *Contaminated Land Management Guidelines Nos. 1 and 5* (MfE, revised 2021).

Areas of Potential Contamination (AOPC)

The PSI & DSI identifies areas of potential contamination limited to the northern section of the pit development area, where quarrying is proposed in Stages 7 and 8 (approximately 35 – 50 years in the future). These areas include:

- C + R Rack (fuel storage, maintenance area)
- Graveyard and extension of graveyard (machinery storage and maintenance)
- Hay Paddock overburden disposal area
- Residential property at 193 Middleton Road

The following HAIL activities were considered to apply to the above AOPC:

- HAIL Item A17 – storage tanks or drums for fuel, chemicals or liquid waste. A site walkover noted the storage of fuel (diesel in bunded ASTs), oil (various drums/jerry cans) and waste oil (in a bunded IBC) at the C+R Rack area.
- HAIL Item F4 – motor vehicle workshops. Evidence of the maintenance of heavy machinery was noted at the C+R Rack, Graveyard and extension of Graveyard areas during the site walkover.
- Potential HAIL Item I – land that has been subject to intentional release of a hazardous substance in sufficient quantity that it could be a risk to human health or the environment. Council's Site Contamination Enquiry response and historical aerial photographs identified earthworks in the northeastern corner of the investigation area (i.e. the Hay Paddock OBDA) that appear to be from the disposal of overburden.

The remainder of the proposed pit area (Stages 1–6) does not contain identified HAIL land uses. The contaminated land provisions of the NES:CS and Chapter E30 of the AUP(OP) therefore are not considered to apply to this area.

Intrusive Investigation Findings

Targeted soil sampling was undertaken to investigate the potential for the HAIL activities to have caused soil contamination. As detailed in section 10 of the DSI, samples were taken from 16 locations (associated with the storage of fuel, oil and waste oil, maintenance of heavy machinery and disposal of possible uncertified fill material) at maximum depth of 0.3 m below ground level (bgl). The samples were sent to an accredited laboratory and analysed for the following:

- Samples were analysed for heavy metals and polycyclic aromatic hydrocarbons (PAHs).
- The nine surface soils where hydrocarbon staining was observed and the subsurface soil samples from four of these locations were tested for total petroleum hydrocarbons (TPHs).

All but one of the surface and subsurface soil samples analysed comply with the relevant NES:CS Soil Contaminant Standards (SCS) and Soil Guideline Values for commercial/industrial land use. The exceedance was in surface soil sample PMS08 (0–0.1 m) from the extension of the Graveyard area, where TPH C10–C14 (1,840 mg/kg) exceeded the Tier 1 guideline value for surface sand (1,500 mg/kg).

This exceedance is attributed to diesel contamination. PAH concentrations at PMS08 were low and well below applicable guideline values, indicating a low human health risk. A corresponding subsurface sample (PMS18 at 0.3 m depth) showed a reduced TPH concentration (840 mg/kg), demonstrating decreasing concentrations with depth.

PAH and/or TPH compounds were detected at above laboratory detection limits in soils from the C+R Rack, Graveyard, and Graveyard extension areas.

Two surface samples from the C+R Rack area marginally exceeded typical background levels for zinc.

Aside from the shallow soils near PMS08, soil disturbance associated with the proposed pit development is unlikely to pose an unacceptable risk to human health for commercial/industrial users.

All soil samples reported concentrations of heavy metals and PAHs below the Permitted Activity (PA) soil acceptance criteria detailed in Table E30.6.1.4.1 of the AUP(OP). The disturbance of shallow soil (0 – 0.3 m bgl) in the vicinity of PMS08 (with elevated TPH C10-C14) was considered to pose a low risk to the environment given its isolated location and distance from surface waterbodies.

Soil Management

Any future handling or disturbance of shallow hydrocarbon-impacted soils should follow petroleum industry management protocols. The PSI & DSI recommends that these protocols are detailed in a Site Management Plan (SMP) that is to be included as a condition of consent.

The shallow impacted soils at location PMS08 (0-0.3 m bgl) are to be excavated and disposed of off-site (prior to undertaking bulk earthworks within the graveyard extension area) at an appropriately licensed facility to avoid the need for a long-term discharge consent under the AUP(OP). Subject to management controls, soils within the stockyard areas may be reused on-site however, excess material from these areas is not considered clean fill. Soils outside of the stockyard areas are considered to meet clean fill criteria.

PSI & DSI Conclusions and Recommendations

The PSI & DSI concludes that the NES:CS and Chapter E30 of the AUP(OP) do not apply to soil disturbance across the pit development areas of Stages 1-6. Due to the exceedances of background concentrations, soil disturbance in the areas of Stages 7 and 8 are proposed to be a Controlled Activity (CA) under Regulation 9 of the NES:CS. A Site Management Plan (SMP) will be required prior to soil disturbance in these areas (Stages 7 and 8).

Section 16 of the PSI & DSI proposes conditions related to the undertaking of detailed site investigations (DSIs) for Stages 7 and 8 prior to the start of quarrying activities in these areas.

Review Comments and Assessment

I consider that the PSI & DSI has been prepared by a SQEP in general accordance with the *Contaminated Land Management Guidelines Nos. 1 and 5* (MfE, revised 2021) and adequately details the likely soil contamination profile of the site.

Since quarrying of the northern portion of the pit development area is planned for Stages 7 and 8 approximately 35-50 years after the start of the proposed pit development, I agree with the PSI & DSI that further DSIs should be undertaken on the stockyard and any other identified HAIL areas that may develop in the next 35 years, prior to any soil disturbance in these areas (and if necessary, further consent be obtained to the extent not already provided for by the works deemed to already require a CA consent in this application).

I consider the proposed conditions in Section 16 of the PSI & DSI to be relevant. They require further investigation in the areas of Stages 7 and 8 prior to works starting in these areas, to determine the need for a Remediation

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Action Plan (RAP). If remediation is required, a Site Validation Report (SVR) is to be submitted to council after remediation works.

I consider that this soil contamination profile is suitable for the proposed commercial/industrial land use. Further, I consider that there is a low risk to the human health of site workers and neighbours as a result of disturbing soils which may contain contamination at levels greater than typical background concentrations, if the management processes outlined by a certified SMP are employed and draft conditions are adhered to.

With respect to Chapter E30 of the AUP(OP):

In agreement with the PSI & DSI, I consider that the proposal does not require consent under the AUP(OP) Chapter E30 contaminant provisions. The DSI & PSI adequately demonstrates that contaminant concentrations do not exceed the PA soil acceptance criteria in AUP(OP) Table E30.6.1.4.1 and therefore, the soils do not contain 'elevated levels of contaminants.' Accordingly, no Contaminant Discharge Consent is required under the AUP(OP) for the proposal at this stage.

With respect to the NES:CS:

The proposed soil disturbance activity is a CA under Regulation 9(1) of the NES:CS as:

- The PSI & DSI identified soil contaminants at levels exceeding background but less than relevant SCS for the protection of human health;
- The volume of soil disturbance to be undertaken will likely exceed the PA threshold of Regulation 8(3) of the NES:CS for the piece of land where the HAIL activity occurred.
- The CA standards of Regulation 9(1) are met as an adequate DSI has been submitted.

Implementation of the recommended consent conditions provided below and adherence to a certified SMP will suitably assist in mitigating potential adverse effects on human health during the proposed works. The recommended conditions of consent are within the matters of control detailed within Regulations 9(2) of the NES:CS.

6.0 Section 67 Information Gap

I have identified that there are no section 67 information gaps.

7.0 Recommendation

I recommend that the applicant produces a Works Completion Report following works in relevant AOPC, in accordance with Regulation 9(2) of the NES:CS. This is to ensure risk to the environment and human health from disturbing soil with elevated levels of contaminants greater than typical background concentrations are adequately mitigated.

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Given the CA status of the proposal, a SMP is required to comply with Regulation 9(2) of the NES-CS. I agree with the recommendations of the PSI & DSI in that an intrusive investigation be undertaken in Stages 7 and 8 prior to the start of quarrying activities in these areas, to determine the need for future consents if future works (relating to contamination) are not already provided for by the CA consent. I consider that the applicant's proposed conditions are generally similar to those issued for other consents of a similar nature.

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Overall, I consider that there is a low risk to the human health of site workers and neighbours as a result of disturbing soils which may contain contamination at levels greater than typical background concentrations, if the management processes outlined by a certified SMP are employed and draft conditions are adhered to.

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8.0 Proposed Conditions

I have reviewed the proposed conditions provided by the applicant and recommend the following:

Land-use Condition		Review comments/recommendations
38	The objective of the Contaminated Site Management Plan (CSMP) is to detail the measures and procedures to be implemented for the handling and reuse of contaminated soils within Stages 7 and 8 of the Project to minimise effects on human health and the environment and ensure compliance with the requirements in Conditions 102-108 .	Given the CA status of the proposal, a SMP is required to comply with Regulation 9(2) of the NES-CS.
39	The CSMP must include: (a) the lateral and vertical extent, and nature of contamination as determined by the Detailed Site Investigation required by Condition 102 ; (b) the remediation objectives, if remediation is required; (c) remediation and site management mitigation measures and procedures; and (d) disposal locations and requirements for any material or soil removed from the Site.	I recommend no amendments to this proposed condition.
102	The Consent Holder must engage a SQEP to complete a Detailed Site Investigation (DSI) for Stages 7 and 8 of the Project at least six months prior to the commencement of Stages 7 and 8.	I recommend no amendments to this proposed condition.
103	The DSI required under Condition 102 must: (a) be undertaken in accordance with the NES-CS; (b) delineate the lateral and vertical extents of the identified HAIL sites within Stages 7 and 8; and (c) determine if remediation is required.	I recommend no amendments to this proposed condition.
104	If contaminated materials or soils are discovered as part of the DSI required by Condition 102 , the Consent Holder must prepare and submit a Contaminated Site Management Plan (CSMP) in accordance with Condition 38-39 for certification in accordance with Conditions 22 - 26 .	I recommend no amendments to this proposed condition.

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106	The excavation and re-use of materials or soils identified by the DSI required by Condition 102 must be undertaken in accordance with the certified CSMP and supervised and validated by a SQEP. Within three months of the completion of the works, the Consent Holder must submit a Site Validation Report confirming compliance with the certified CSMP to the Council.	I recommend no amendments to this proposed condition.
107	Any material removed from the Site must be disposed of at a facility authorised to receive such material, and the Consent Holder must provide the Council, with written confirmation of such disposal within 10 working days.	I recommend no amendments to this proposed condition.
108	Within three months of the completion of earthworks in Stages 7 and 8, a Works Completion Report must be submitted to the Council for review and certification. The Works Completion Report must contain sufficient detail to address the following matters: (a) A summary of the works undertaken, including the location and dimensions of the excavations carried out and the volume of soil excavated; (b) Conditions of the final site contamination profile, including details and results of any validation testing undertaken (with a map of sampling locations and tabulated sampling results) and interpretation of the results in the context of the NES:CS and the AUP(OP) for the proposed lot; (c) Records/evidence of the appropriate disposal for any material removed from the site; (d) Records of any unexpected contamination encountered during the works and response actions, if applicable; (e) Any on-going monitoring and/or management measures required to minimise risks to human health or the environment as a result of the final site contamination profile. (f) Reports of any complaints, health and safety incidents related to contamination, and/or contingency events during the remedial works; and (g) A statement certifying that all works have been carried out in	I recommend the provision of a Works Completion Report (WCR) to report on the works completed in accordance with the CSMP. This recommendation is also with the view that the PSI & DSI point to one localised area (PMS08 (0-0.3 m bgl)) that is to be excavated and disposed of off-site to avoid the need for a long-term discharge consent.

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	accordance with the requirements of the consent, otherwise providing details of relevant breaches, if applicable.	
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TECHNICAL SPECIALIST MEMO - HUNUA QUARRY DEVELOPMENT

To:

Emma Chandler – Lead Planner (Resource consents)
Warwick Pascoe – Premium Project Lead (Resource consents)

From:

Andrew David Miller – Consultant Parks Planner (Parks and Community Facilities)

Qualifications
& Relevant
Experience:

I am a consultant planner at CoLab Planning Limited acting for Parks and Community Facilities at Auckland Council. I hold the qualification of Bachelor of Planning (Hons) and have 11 years of experience in planning practice. I am an intermediate member of the New Zealand Planning Institute. I have experience in preparing technical assessments and providing expert evidence for complex resource consent applications and plan changes, including other Fast-track applications. I have appeared as an expert witness in various Council hearings and to a lesser extent in Environment Court proceedings.

Preparation in
Accordance
with the Code
of Conduct:

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Date:

27 July 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:

Hunua Quarry Development

Fast-Track application number:

FTAA-2603-1185 (Council Reference BUN60464053)

Site address:

489 Hunua Road, Hunua, Auckland

2.0 DOCUMENTS REVIEWED AND INPUT OBTAINED

I have reviewed the following documents:

Application material:

- AEE by Boffa Miskell dated 30 March 2026
- Consultation Summary Report dated 30 March 2026
- Section 30 letter from Auckland Council dated 24 March 2026
- Records of Title
- Engagement Report dated 30 March 2026
- Location Survey Plans by CKL
- Location Plans by Boffa Miskell
- Subdivision plans – dated June 2026
- Stream Realignment Management Plan dated 30 March 2026
- Written approvals
- Compliance Tables by Boffa Miskell
- Letter and attachments from Boffa Miskell to Fast Track panel dated 22 June 2026
- Joint Memorandum by Winstone Aggregates and Auckland Council dated 22 June 2026
- Conditions set dated 14 July 2026

Other material:

- Minutes 1-3 by the expert panel
- Updated scheme plan dated 24 July 2026

I have obtained input from the following technical experts when forming my view on the proposal:

- David Barker - Parks and Places Specialist
- Miranda Bennett - Principal Ranger - Environment
- Andrew Rossaak – Ecologist

For completeness, it is noted that Miranda Bennett is a signatory on a written approval supplied by Winstone Aggregates dated 23 March 2026 in her capacity as representing a landowner/asset manager for the Hunua Ranges Regional Park.

3.0 SPECIALIST ASSESSMENT

There are no direct impacts on any existing parks, open space zoned land, or land administered by Parks and Community Facilities because of the quarry expansion itself. The proposal engages parks interests in two respects: the proposed biodiversity offsetting and compensation within the Hunua Ranges Regional Park, and a boundary adjustment which potentially triggers the esplanade reserve provisions of the Resource Management Act 1991 ('RMA').

Biodiversity offsetting and compensation

The proposal involves the removal of substantial areas of existing vegetation, including wetlands, and a stream realignment to enable the expanded quarry footprint. The applicant proposes a large offset and

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compensation package in response, and several of the candidate recipient sites are located within the Hunua Ranges Regional Park (refer Appendix B12.11). The adequacy of the quantum of offsetting and compensation is an ecological matter under review by the Council's technical ecologists and is not addressed further in this memo.

The applicant has consulted with the Regional Parks team, and an in-principle written approval has been provided. Miranda Bennett and Trent Taylor from the Regional Parks team have met with the applicant and its ecologist, including on site, to identify suitable restoration and enhancement opportunities, including pest plant control, restoration planting, riparian and wetland restoration, and lizard release sites. Regional Parks advise that these projects would greatly benefit the regional park, enabling restoration of riparian, wetland and forest areas beyond the team's current capacity and funding. On the basis of that input, the offsetting and compensation directed to the regional park is supported and would be broadly consistent with the Regional Parks Management Plan 2022.

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The in-principle approval does not itself authorise the works in the park. Should the Panel be minded to grant consent, formal third-party landowner agreements will need to be concluded with the Regional Parks team, addressing operational matters as set out in the recommended Condition 140 advice note (refer section 5). Moreover, Regional Parks, as land manager and approver, will require the review and approval of site-specific delivery plans for any works within the park, including pest plant and animal control, planting plans, and kauri dieback management. For completeness, I note that the proposed conditions set includes conditions/management plans which seek to give effect to similar matters, such as:

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- Ecological Management Plan (EcMP) – conditions 56-57
- Lizard Management Plan (LMP) - conditions 60-61
- Pest Management Plan (PMP) – condition 62-63

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If consent is granted, the conditions of consent will require finalised management plans to be prepared by the applicant. In my view, those plans and any plans required by Parks in its capacity as landowner should be one and the same or, at a minimum, fully consistent to avoid conflicting requirements or expectations. An advice note on the management plan conditions is recommended (refer section 5).

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Boundary adjustment and esplanade reserves

In the AEE report, the applicant states that the proposal includes a "boundary adjustment" between the subject site and 163 Middleton Road. The applicant's stated reasons for the "adjustment" are that the expanded quarry footprint must be accommodated within the quarry's legal landholdings, and that a suitable buffer is required to manage reverse sensitivity and stability effects on that neighbour.

The lodged scheme plan showed the adjustment in an atypical way, by creating a new allotment (proposed Lot 2, 3.56ha) which is then to be amalgamated via a condition with Lot 2 DP 115598 (part of the existing quarry landholdings). The creation of an allotment of less than 4ha triggers s230 of the RMA, under which an esplanade reserve 20m in width is to be set aside from that allotment along the bank of any river whose bed has an average width of 3m or more, unless the requirement is reduced or waived by a rule in the district plan or by resource consent.

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Following feedback from the Council, the applicant provided an updated scheme plan (A25424 Drawing 1600, Revision) dated 24 July 2026 by CKL Consulting. At the time of writing this memo, it is understood that this updated scheme plan has not been formally provided to the Panel, and so confirmation from the applicant should be obtained in this regard. On the basis that the 24 July 2026 scheme plan is adopted as

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part of the proposal, both proposed lots in question would be greater than 4ha in size meaning that s230 of the RMA would not be triggered.

4.0 RECOMMENDATION

As noted above, there are no direct impacts on any existing parks or open space zoned land as a result of the proposed quarry expansion.

The proposed biodiversity offsetting and compensation within the Hunua Ranges Regional Park is supported from a parks' perspective. That support is subject to formal third-party landowner agreements being concluded with the Regional Parks team should consent be granted. Advice notes on the management plan conditions are recommended (refer section 5).

It is recommended that the Panel confirm with the applicant that they seek to proceed with the new scheme plan dated 24 July 2026, and potentially requesting this confirmation under s67 of the Fast-track Approvals Act 2024. If the applicant does not proceed with the revised scheme plan, the applicant should clarify how the boundary adjustment is to be undertaken and whether the esplanade reserve requirements of s230 of the RMA are triggered. Should those requirements be triggered, an esplanade reserve or strip at this location will require an assessment for Parks to form an opinion on the outcome.

5.0 PROPOSED CONDITIONS, COMMENTS AND SUGGESTIONS

CONDITION

No changes are recommended to the wording of the proposed conditions. It is recommended that advice notes be added to the following effect:

Condition 24	Advice notes: <i>Any management plans prepared under these conditions that relate to works within the Hunua Ranges Regional Park should be one and the same as, or consistent with, the management plans required by Auckland Council (Parks and Community Facilities) in its capacity as landowner. Early and ongoing engagement with the Regional Parks team on the adequacy of those plans is recommended. Note that one set of management plans does not override the other, and the consent holder will be responsible for ensuring that they remain compliant with their conditions of the resource consent as well as any requirements of Parks and Community Facilities.</i>
Condition 140	Advice notes: <i>The written approval provided by Auckland Council (Parks and Community Facilities) is an in-principle landowner approval only and does not itself authorise offsetting or compensation works within the Hunua Ranges Regional Park. Prior to carrying out any such works within the park, the Consent Holder must conclude a separate landowner agreement with Auckland Council's Regional Parks team addressing operational matters, including (but not limited to) access arrangements, health and safety requirements, staging and methodology of works, maintenance and monitoring obligations, long-term management responsibilities, and any cost recovery or funding arrangements.</i>

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Condition 141	Advice notes: <i>No ongoing legal protection is identified in Table 2 for the offset and compensation sites within the Hunua Ranges Regional Park, as the park is already legally protected in its status as a regional park. For clarity, Auckland Council will not accept covenants or other legal instruments being registered on the records of title for its regional park land.</i>
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Prepared by:

Agency Lead / Manager Release:



Andrew David Miller
Consultant Parks Planner
Parks Planning
Parks and Community Facilities
Date: 27 July 2026



Hester Gerber
Manager Parks Planning
Parks Planning
Parks and Community Facilities
Date: 27 July 2026

Specialist Response Template – Fast-track Approvals Act 2024 – Substantive Application

Technical Specialist Memo - Stormwater

To:

Emma Chandler – Consultant Planner
Warwick Pascoe – Principal Project Lead

From:

Hillary Johnston – Consultant Specialist, Stormwater, Wastewater and Industrial Trade Activities, Specialist Input Unit, Resource Consents Department

Qualifications & Relevant Experience:

I hold the qualification(s) of Bachelor of Science in Environmental Science and Geography, and have 12 years of experience in regulatory stormwater assessments. I am a Certified Environmental Practitioner, a full member of the Environmental Institute of Australia and New Zealand, a member of WaterNZ, and an associate member of Engineering New Zealand. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation, and fast-track applications, and have appeared as an expert witness for Council before consent authorities and the Environment Court.

Preparation in Accordance with the Code of Conduct:

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses ([Code](#)), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Date:

31 July 2026

1.0 Application Description

Application and property details

Fast-Track project name:

Hunua Quarry Expansion

Fast-Track application number:

FTAA-2603-1185 (EPA reference)
BUN60464053 (Auckland Council reference)

Site address:

489 Hunua Road, Hunua

2.0 Documents Reviewed

The following documents have been reviewed in preparation of this memorandum:

- *Hunua Quarry Development, Substantive Application, Part B – Assessment of Environmental Effects and Application for Resource Consent – Version 1*, dated 22 June 2026, prepared by Boffa Miskell
- *Appendix B12.2b: Location Plan – Boffa Miskell Plans*, dated 27 March 2026
- *Appendix B12.3aa: Plans of the Proposal*, dated 27 March 2026
- *Appendix B12.4.5a & 5b: Ecological Assessment*, dated 28 March 2026
- *Appendix B12.4.6a & 6b: Mangapū Tributary Realignment – Preliminary Design and Effects Technical Report*, Revision G, dated 30 March 2026
- *Appendix B12.4.7: Erosion and Sediment Control Assessment Report, Hunua Quarry – Substantive Application under the Fast Track Approvals Act 2025*, Revision 2, dated 19 June 2026
- *Appendix B12.4.15: West Haul Road Culvert Design and Flood Risk Assessment*, dated 30 March 2026
- *Appendix B12.8.8: Hunua Quarry Management Plan*, dated March 2026
- *Appendix B12.9: Relevant Objectives, Policies and Statutory Assessment*, dated 30 March 2026
- *Appendix B12.10: Compliance Table for the Relevant Plans and Planning Instruments*
- *Appendix 4: Hunua Quarry Development, Graphic Supplement*, dated 16 March 2026
- *Resource Consent Conditions – Hunua Quarry: Symonds Hill Pit Development, Hunua Quarry Development [FTA368] Draft Applicant Condition Set*, dated 22 June 2026
- *Appendix 1: Request for Further Information Tracker*, dated 22 June 2026
- *Memorandum: Hunua Quarry – Auckland Council RfI*, dated 18 June 2026 and prepared by PDP

3.0 Additional Reasons for Consent Not included in AEE

The site is zoned *Special Purpose – Quarry Zone* and the expanded quarry footprint will extend into the adjoining *Rural – Mixed Rural Zone*. It is not subject to a Stormwater Management Area – Flow overlay.

Consent is sought as a **Discretionary Activity** under the National Environmental Standards for Freshwater (NES:F) Regulation 45A(4) for the taking, use, damming, or diversion of water within, or within a 100 m setback from, a natural inland wetland and under Regulation 45A(5) for the discharge of water into water within, or within a 100 m setback from a natural inland wetland.

The Applicant has applied for a private diversion and discharge of stormwater consent (referenced by Council as DIS60464131). Consent is sought as a **Discretionary Activity** under

E8.4.1 (A10). The Applicant has clarified that the entire quarry is considered impervious, including the quarry pit and haul roads.

The reasons for consent identified by the Applicant's Agents are agreed with.

The Application material does not identify whether any industrial or trade activities (ITA) are proposed within the expansion area, or confirm whether the proposed expansion includes any ancillary existing or future ITA (e.g. concrete batching or crushing). Notwithstanding this, it is noted that quarrying activities do not trigger consent under Chapter E33 of the AUP. Quarrying is not identified as a listed activity under Table E33.4.3, and the classification of *Recycling, recovery, reuse or disposal – Crushing, grinding or separation works* expressly excludes activities involving sand, gravel, rock or mineral products. On this basis, the proposed quarry expansion and associated extraction and processing activities do not require resource consent under Chapter E33. Confirmation of the nature and extent of any ancillary activities proposed within the expansion area would assist in confirming whether any additional consents are needed.

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4.0 Specialist Assessment

Engagement

A site visit was undertaken to Hunua Quarry on the 4th February 2026. The Applicant's Team provided a comprehensive tour of the existing site operations including the existing quarry pit and associated sediment control ponds, a general indication of the expansion areas, and processing areas.

A response to preliminary Council RFI's was provided by the Applicant's Agent dated 22 June 2026. Responses within the tracking table (and supporting information) have been reviewed and considered as part of this assessment.

The proposed conditions of consent relating to the management of stormwater have been reviewed and refined based on discussion with the Applicant's Agents.

At the time of writing no additional further engagement or meetings with the Applicant's Team or Agents in relation to the management of stormwater have been undertaken.

Existing environment

Hunua Quarry is an established quarry that has operated in the area for over 100 years. Existing quarrying, processing, and associated activities are already undertaken on the site. The current proposal seeks to expand quarry operations into the Symonds Hill Pit area.

The proposed quarry expansion is located within the Mangapū Stream catchment. As described in the Application, stormwater runoff from the proposed quarry expansion will be managed, primarily through sediment retention ponds, and discharged to the Mangapū Stream.

Potential effects

Access to the expanded quarry area is proposed to be provided via new haul roads. The Stage 2 haul road will include two culverts, approximately 50 m and 75 m in length.

The primary contaminant of concern in relation to stormwater runoff is sediment (suspended solids). Potential sources of sediment are associated with overburden removal, stockpiling, the expansion of the quarry footprint, and vehicle and machinery movements.

The Application includes stream reclamation, stream diversion, and associated quarry development works resulting in the permanent removal of approximately 527 m of intermittent and permanent stream reaches and the realignment of approximately 1,200 m of the Mangapū Stream. The proposal will also result in the removal of approximately 0.22 ha of wetland habitat and the likely drainage of a further 0.23 ha of wetland extent.

Proposed mitigation

Stormwater

The management of stormwater effects associated with the proposed quarry expansion cannot be considered in isolation from the wider quarry water and environmental management frameworks. The proposed management of effects relies on an integrated approach incorporating stormwater treatment, erosion and sediment control, quarry dewatering, stream flow augmentation, and operational management measures implemented through management plans and proposed consent conditions.

The Application outlines that stormwater runoff generated from the proposed quarry expansion will be directed to erosion and sediment control devices, including sediment retention ponds, and treated prior to discharge to the Mangapū Stream. This includes stormwater runoff from existing and proposed haul roads associated with the quarry expansion.

Groundwater removed through quarry dewatering will be used for quarry activities including aggregate processing and dust suppression, with a proportion of water returned to the receiving environment to augment stream flows.

The augmentation of stream flow is proposed to maintain baseflow characteristics within the Mangapū Tributary and Mangapū Stream to mitigate the effects of quarry dewatering. The proposed consent conditions require augmentation of stream flows where monitoring identifies a reduction in flow, and include provision for ongoing monitoring and adaptive management of augmentation rates.

Operations will be managed in accordance with the Quarry Management Plan (QMP). The QMP put forward as part of the Application is a revision of the existing Hunua Quarry management

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plan and has been updated to incorporate the proposed Symonds Hill quarry expansion, associated staging, progressive rehabilitation, and environmental management measures.

Flooding

Stage 2 Eastern Culvert

The AEE outlines that the eastern Stage 2 culvert is proposed within a permanent stream identified as being subject to High and Very High Flood Hazards and located within the 1% AEP floodplain. It is understood that the culvert has been designed to convey up to the 2% AEP event, with larger flood events attenuated behind the culvert, increasing the water level up to 300 mm upstream.

The Applicant has provided additional information indicating that the modelled 1% AEP flood level remains within the gullies. While the additional information reduces concern regarding overtopping of the gully margins, it does not fully demonstrate culvert performance under defined blockage scenarios or provide sufficient detail to confirm available freeboard to the haul road embankment crest during larger flood events.

Additional information should be provided to demonstrate the performance of the culvert under blockage conditions. Cross-sections showing the culvert configuration, modelled 1% AEP flood level, and available freeboard to the haul road crest should be provided. This information would clarify whether the predicted attenuated water remains confined behind the culvert within the gully system, or whether there is any increased risk of overtopping of the haul road embankment in larger events, leading to potential downstream flooding impacts.

Downstream Flood Impacts

The *Mangapū Tributary Realignment – Preliminary Design and Effects Technical Assessment* concludes that the proposed stream realignment will result in increases in flood levels of up to 50 mm within land owned by the Applicant and up to 15 mm within rural residential areas, with no effects on existing buildings. The Assessment is based on a preliminary channel design. Condition 65 of the proposed conditions of consent (dated 22/06) requires a further hydrological assessment to be undertaken based on the detailed design of the channel, prior to construction. While this provides an opportunity to confirm the hydraulic performance of the final design (prior to construction), consideration should be given to whether amendment to Condition 65 or a further condition requiring verification of flood effects based on as-built information following completion of the stream realignment, including confirmation that the final constructed channel achieves the anticipated flood level outcomes, would be appropriate. An additional Condition 65A has been suggested within Section 7 of this memo.

Natural wetlands

The proposal will result in the loss of approximately 0.22 ha of natural wetland habitat, with a further 0.23 ha of wetland habitat potentially affected through drainage associated with quarry

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dewatering activities. The Application outlines that these effects are associated with the development of the Symonds Hill Pit and associated quarry infrastructure within the proposed quarry development area. In addition to wetland effects, the proposal includes the permanent loss of approximately 527 m of intermittent and permanent stream reaches and the realignment of approximately 1,200 m of the Mangapū Tributary.

The Applicant has proposed a mitigation and offset package to address effects on wetlands and streams. The extent of wetland and stream loss, and the adequacy of the proposed mitigation and offset and compensation package is assessed in detail by Council's ecological specialist.

5.0 Section 67 Information Gap

I have identified that there are no section 67 information gaps. Preliminary comments on the Application were provided to the Applicant's Agents and have been partially addressed through the RFI tracking table and revised conditions dated 22 June 2026. These items were queried as part of the preliminary council RFI & associated consultation with the Applicant, however no response has been received at the time of writing. The need for minor clarifications remain which include:

- Confirmation of whether the application includes ancillary activities that would require consent under Chapter E33 of the AUP.
- Eastern culvert flood performance, including confirmation of upstream flood level effects during events great than the 2% AEP, with consideration of partial and full blockage scenarios and available freeboard to the haul road crest.
- Downstream flood impacts associated with the Mangapū Tributary realignment, including consideration of whether a condition requiring confirmation that the constructed channel achieves outcomes consistent with the preliminary flood modelling assessment would be appropriate.

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6.0 Recommendation

Based on the information provided in the Application documents, and subject to minor clarifications outlined within this memo, I am satisfied that the proposed stormwater management approach is appropriate for the proposed quarry expansion, provided the Applicant complies with the proposed conditions of consent.

Accordingly, based on the information available, I support the application from a stormwater perspective.

7.0 Proposed Conditions

Comments on proposed conditions of consent (22 June 2026) are included as follows.

Note: Where a condition is not addressed within this assessment, it should be taken as having no comment or objection.

No.	Condition	SWWWITA Comment
115 (previously 105)	Water Quality Monitoring The Consent Holder must undertake the following monitoring during Earthworks following rainfall trigger event of 25mm in a 24 hour period and 15mm in a 1 hour period: (a) Visual inspections of all SRPs and DEB's; (b) Visual inspection of all receiving watercourses; (c) Manual inlet and outlet sampling from SRPs as detailed in Condition 106(c) <u>116(c)</u> .	16/06: Support inclusion however, there is no requirement for ongoing or routine stream quality monitoring during operations. Ongoing monitoring requirements are primarily focussed on groundwater abstraction effects, stream flow, and augmentation performance. 27/07: Comment dated 16/06 has been addressed by inclusion of Conditions 44 and 45. Reference to 106(c) will need revision and has been suggested.
44 (previously 105A)	Water Quality Monitoring and Management Plan The objective of the Water Quality Monitoring and Management Plan (WQMMP) is to outline the water quality monitoring requirements for the stream receiving environments to assess potential effects on water quality and enable appropriate management responses.	16/06: New condition suggested. 27/07: Addressed. Included as Condition 44.
45 (previously 105B)	The WQMMP must include: (a) A drawing showing the monitoring locations upstream and downstream of discharge points; (b) Details of the methodology for undertaking water quality monitoring; (c) The frequency of water quality monitoring; (d) The monitoring parameters to be tested, which must include turbidity (NTU), pH, and total suspended solids (mg/L); and (e) Details of the response actions to be implemented where downstream monitoring results indicate significant or sustained deviations in turbidity, pH, or TSS relative to upstream results that can be attributed to discharges from the site.	16/06: New condition suggested. WQMP typically also include the undertaking of baseline water quality monitoring to inform the establishment of monitoring parameters and trigger levels. If sufficient baseline data is not already available, this may be appropriate to also include. 27/07: Addressed. Included as Condition 45.
199-205 (previously 182-188)	Augmentation Water Quality Monitoring If monitoring required by Condition 182 <u>199</u> identifies an increase in the parameters listed in Condition 185 <u>202</u> caused by the exercise of this consent, the consent holder must prepare and submit to the Council a mitigation plan outlining mitigation measures to be implemented to address such effects.	Conditions 182-188 include monitoring requirements and performance criteria for augmentation water quality (temperature and dissolved oxygen). There are no explicit response requirements in the event this criteria is not met. It is recommend that consideration be given to including an additional condition in this respect. 27/07: Included within Condition 204, minor revisions required as suggested.

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65	Downstream Flood Impacts Prior to finalising detailed design of the diversion channel, hydrodynamic modelling must be undertaken using the most up to date design to verify downstream flooding effects. Modelling outputs will need to demonstrate the following flood levels will not be exceeded: (a) 50mm in forested areas; and/or (b) Up to 15mm in rural residential area; and/or (c) No flooding effects on existing buildings.	16/06: It is understood that the modelling for the Mangapū Tributary Realignment has been undertaken based on a preliminary design for the realigned channel and that detailed design is still under development. Condition 65 included and will verify the outcomes of the detailed design of the channel prior to construction. 27/07: The Applicant's Agent should consider the appropriateness of a condition that would require the model to be rerun incorporating the finalised Channel design, to verify the effects of the downstream environment once the Channel has been constructed. Condition 65A has been suggested to address this.
<u>65A</u>	<u>Within 12 months of completion of the diversion channel, the Consent Holder must undertake hydrodynamic modelling based on the as-built survey of the completed channel and provide a verification report to Auckland Council. The purpose of the report shall be to confirm that the completed channel performs generally in accordance with the flood modelling undertaken under Condition 65 and that no material increase in downstream flooding effects has occurred as a result of the final constructed channel.</u>	

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Technical Specialist Memo - Hunua Quarry Expansion – 489 Hunua Road, Archaeological Assessment

To: Emma Chandler – Lead Planner & Warwick Pascoe - PPL

From: Joe Mills – Specialist Historic Heritage

Qualifications & Relevant Experience: I hold a Master of Arts (Hons) in Anthropology specializing in archaeology from the University of Auckland. I have been employed by Auckland Council as an archaeologist and heritage specialist since 2016. In my role, I am required to undertake technical reviews of resource consent applications and Notices of Requirement. I also provide advice and subject matter expertise assessments to Council officers on matters relating to archaeology and historic heritage.

Preparation in Accordance with the Code of Conduct: I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Date: 21 May 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name: Hunua Quarry Expansion

Fast-Track application number: FTAA-2603-1185 (Council Reference BUN60464053)

Site address: 489 Hunua Road, Hunua

2.0 Documents Reviewed

Assessment of Environmental Effects and Application for Resource Consent. Prepared by Boffa Miskell for Winstone Aggregates. March 2026. (AEE)

Proposed Hunua Quarry Development: Archaeological Assessment. Prepared by Clough and Associates for Winstone Aggregates. February 2026.

Archaeological Management Plan: Hunua Quarry, Auckland. Prepared by Clough and Associates for Winstone Aggregates. March 2026.

Archaeological Authority. Prepared by Boffa Miskell for Winstone Aggregates. April 2026.

3.0 Specialist Assessment

The proposed works, as described in the application and supporting documents, will not impact any scheduled historic heritage sites in Schedule 14.1 (Schedule of Historic Heritage) in the Auckland Unitary Plan, nor any recorded unscheduled archaeological or historic heritage sites.

For this specific application, the Cultural Heritage Implementation Team believe that appropriate mitigation for the effects of the proposed works on unscheduled archaeological sites are managed by the Heritage New Zealand Pouhere Taonga Act 2014. We note that the applicants have applied for an Archaeological Authority under the FTAA Act and have provided Archaeological Authority conditions. We are supportive of these conditions.

In instances where an Archaeological Authority is not in place or does not apply to the works in question, there is the potential for further unrecorded archaeological material or historic heritage sites to be impacted by the proposed works. This risk can effectively be managed through adherence to the Auckland Unitary Plan Accidental Discovery Rule (E11.6.1, E12.6.1). I note that the applicant has offered a condition to this effect and we are supportive of this condition.

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4.0 Recommendation

Should the Expert Panel choose to grant this application I support the conditions proposed in the archaeological assessment, archaeological management plan, and the archaeological authority. These will provide effective management for the effects on unrecorded archaeological material.

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**5.0 Proposed Conditions, comments and suggestions
(based on condition set provided 19/05/2026)**

Condition

84	Archaeological Accidental Discovery Protocol Any Earthworks undertaken during Stages 4 – 8 of the Project that results in the discovery of any archaeological material, including any artefact, kōiwi (human remains), or taonga, must be managed either: (a) in compliance with the accidental discovery protocols set out in E11 Land Disturbance – Regional, Accidental Discovery Rule E11.6.1 and E12 Land Disturbance – District Accidental, Discovery Rule E12.6.1 of the AUP; or (b) in accordance with an Archaeological Authority issued by Heritage New Zealand Pouhere Taonga covering these stages. Advice note: Earthworks undertaken during Stages 1 – 3 are to be managed in accordance with the Archaeological Authority issued by Heritage New Zealand Pouhere Taonga.
Comment or suggestion	In support.
	PART H – ARCHAEOLOGICAL AUTHORITY CONDITIONS (Not reproduced for length)
Comment or suggestion	In support. We appreciate the addition of final reporting supplied to Auckland Council Heritage Unit as an Advice Note.

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Franklin Local Board Feedback – Fast-track Approvals Act 2024

Project Name:

FTAA-2603-1185 - Hunua Quarry Development Fast-track application to expand the quarry to increase annual capacity to 5.4 million tonnes of aggregate, and to enable the extraction of aggregate for a further 80 years.

Location:

489 Hunua Road, Drury, Auckland 2113

Date:

16 July 2026

Prepared by:

Franklin Local Board Wairoa Subdivision Lead – Amanda Hopkins (in consultation with the board chair, Alan Cole, and Wairoa subdivision members Alix Bonnington and Clare Alder).

1. Context – About Fast-track Applications

The Fast-track Approvals Act 2024 (FTAA) provides a streamlined consenting process for projects deemed to have significant regional or national benefit. Decisions are made by an appointed **Expert Panel**, with no public notification and limited avenues for appeal.

It is important to note:

- The Local Board does **not have a formal decision-making role**, but can provide **local insights** on community impacts, transport, open space, mana whenua engagement, and infrastructure alignment.
- There is **no requirement for applicants to respond to Local Board feedback**, but it can be considered by the Expert Panel.

2. Local Board Feedback

While the Franklin Local Board supports the continued operation and expansion of the Hunua Quarry, it has the following concerns and asks the Panel to consider mitigation and conditions that address these concerns:

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1. Transport and access to the quarry – the Local Board notes the considerable increase in truck movements. It has significant concerns about Hunua Road, which is narrow and windy with sight line issues between Papakura and the entrance to the quarry. The road is down to one lane for part of this corridor due to an ongoing slip on the quarry side. The community reports that trucks regularly cross the centre line and are a safety risk to other road users.

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Road widening and realignment where possible should be considered as conditions to address the safety concerns before truck numbers are increased.

2. Waterways – the Local Board is concerned about the impact of moving the stream and requests that independent evidence be sought and considered.

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3. Ecology – the Local Board notes the removal of native bush and requests that the applicant provides flora and fauna corridors or islands of maintained bush through the site to maintain diversity over the wider area.

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3. Contact for Further Information

Name: Amanda Hopkins

Role: Franklin Local Board Wairoa Subdivision Lead for Fast Track Applications

Email: [REDACTED]

Your Comment on the Hunua Quarry Development project application

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email at substantive@fastrack.govt.nz

1. Contact Details	
Please ensure that you have authority to comment on the application on behalf of those named on this form.	
Organisation name	Department of Conservation
First name	Emily
Last name	Bayliss
Postal address	PO Box 10420, Wellington 6140
Mobile phone	[REDACTED]
Email	fast-track@doc.govt.nz and [REDACTED]

2. We will email you draft conditions of consent for your comment			
X	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

3. Please provide your comments on this application
Please find comments attached



Celia Haden

Acting Fast-track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 11 August 2026

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Comments on a fast-track consenting application

Fast-track Approvals Act 2024 section 53

To: The Expert Panel

From: Department of Conservation

Regarding fast-track project: Hunua Quarry Development

Fast track Reference: FTAA-2603-1185

Overview

- 1.1 Winstone Aggregates (the Applicant) proposes to develop the existing Symonds Hill Pit within the Hunua Quarry to secure additional high-quality greywacke resource and enable the continued extraction of aggregate from the quarry for a further 80 years (the Project).
- 1.2 There is no Public Conservation Land within or adjacent to the Project site.
- 1.3 Approvals are sought in relation to the Resource Management Act 1991 (RMA), the Wildlife Act 1953, and the Freshwater Fisheries Regulations 1983.
- 1.4 The Applicant seeks to vary existing resource consents under s 42(4)(b) of the Fast-track Approvals Act 2024 (the Act).
- 1.5 The Department of Conservation (the Department) undertook a site meeting on 23 January 2026 and has been in ongoing discussions with the Applicant since then.
- 1.6 The Department has already provided two reports under the section 51 of the Act for the wildlife approval and the complex freshwater fisheries approval.
- 1.7 In accordance with sections 53(2)(k) and 53(2)(m)(i) of the Act, the Director-General of Conservation (D-G) has been invited to comment on the substantive application. Statutory delegations are in place for the Department to provide commentary on behalf of the D-G.
- 1.8 The Department appreciates the thoroughness and quality of the Project's application documents. It has allowed the Department's experts to better understand the impacts of the Project, provide targeted comments that will ensure that all effects are appropriately managed, and ensure the conditions are not more onerous than necessary.
- 1.9 Technical advice to inform this report was provided by Dr Amber McEwan (as provided in Appendix 1) on freshwater ecology and Dr Catherine Beard (Senior Science Advisor – Ecology) who has provided advice on terrestrial and wetland ecosystems. Dr Beard's comments have been incorporated into the body of this report.

2 Conservation Values

- 2.1 The Project will result in the loss of indigenous vegetation, wetland and stream habitats, which the Applicant proposes to address through a range of restoration, offset and compensation measures, including revegetation, wetland restoration, stream enhancement and long-term pest management.
- 2.2 The mature secondary forest types present—including tawa–taraire forest, kauri–podocarp–broadleaf forest remnants, and mature kānuka forest—are high-value indigenous ecosystems that provide important habitat, ecological connectivity, and ecosystem functions within the wider Hunua landscape. These are mature forest communities that are not easily replaceable within the proposed duration of the Project.
- 2.3 Several native plant species of regional conservation significance are present within the Project site. Vegetation surveys recorded the regionally endangered Black maire (*Nestegis cunninghamii*), Poataniwha (*Melicope simplex*), and Forster's sedge (*Carex forsteri*). The surveys also recorded Kauri (*Agathis australis*) and King fern (*Ptisana salicina*), both of which are classified as At Risk – Declining nationally.
- 2.4 The Project includes a proposal to infill 1770 m² of the Mangapū tributary 2 and create a new 693 m² channel between the upstream and downstream reaches of Slippery Creek. The Mangapū tributary is of very high ecological value, and as such is also rare in the Slippery Creek catchment and the Manukau Ecological District.
- 2.5 The eDNA sampling detected longfin eel, shortfin eel, banded kōkopu, kōura, and two species of *Zephlebia* that are classified as At Risk – ‘Naturally Uncommon’ in Mangapū tributary. The application misclassified the threat classification of banded kōkopu as ‘Not-Threatened’ whereas the current classification is ‘At-Risk – Naturally Uncommon’. The Auckland region is classified as a banded kōkopu stronghold and is home to more than 20% of the national population.

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3 Assessment of ecological effects and application of the effects management hierarchy

- 3.1 The Department’s assessment has been confined to actual and potential ecological effects of the proposal and the proposed consent conditions that will manage ecological effects and minimise harm to fauna. Accordingly, the Department has not commented on its consistency with the wider statutory framework, except for discussion on the application of the offsetting and compensation principles found in national policy statements below.
- 3.2 Generally, there remains uncertainty around the extent to which values associated with mature indigenous forest and forest seepage wetlands can be replaced, and the time required for replacement habitats to develop comparable ecological functions. It cannot be confirmed whether the offsetting and compensation areas will be able to meet the

0.005

requirements of the National Policy Statement for Indigenous Biodiversity 2023 and the National Policy Statement for Freshwater Management 2020 (both amended December 2025) offsetting and compensation appendices, for ensuring that time lag is minimised.¹

0.005

Terrestrial Flora

3.3 The application of the effects management hierarchy on terrestrial vegetation, riparian margins and wetland function and flora values is appropriate. The proposed restoration, offset and compensation package is broadly consistent with accepted ecological practice and is likely to provide substantial ecological benefits over time.

0.006

3.4 While the Department considers the proposed offset and compensation package to be an appropriate response to the residual loss of mature indigenous vegetation, their loss is still considered ecologically significant. Replacement habitats will require many decades to develop the structure, species composition and ecological functions characteristic of mature forest ecosystems. As a result, there is inherent uncertainty regarding the extent to which equivalent ecological outcomes can be achieved within ecologically meaningful timeframes.

0.007

3.5 The removal of indigenous vegetation will occur well before many of the anticipated restoration outcomes are realised, and some characteristics of mature forest ecosystems may not be fully replicated for many decades, if at all. It is therefore necessary, that the offset and compensation planting occur prior to vegetation clearance and the resource consent conditions should reflect this requirement.

0.008

Wetland Flora

3.6 The proposed wetland offset and compensation package for wetlands are an appropriate response to the residual effects of the proposal on wetlands and likely to provide meaningful ecological benefits.

0.009

3.7 Nevertheless, the permanent loss of forest seepage wetlands remains a significant aspect of the proposal. These wetlands contribute not only to wetland biodiversity values, but also to wider freshwater ecosystem functions through hydrological regulation, flow attenuation, and ecological connectivity between wetland, terrestrial and stream habitats. These systems are strongly influenced by site-specific hydrological processes and may not be fully replaceable through restoration elsewhere.

0.010

3.8 The inclusion of performance standards for the offsetting and compensation sites is therefore an important component of the overall effects management response to ensure

¹ National Policy Statement for Indigenous Biodiversity 2023 (amended December 2025), Appendix 3: Principles for biodiversity offsetting, clause 8; National Policy Statement for Freshwater Management 2020 (amended December 2025), National Policy Statement for Freshwater Management 2020 (amended December 2025), Appendix 6: Principles for aquatic offsetting, clause 8.

that the outcomes stated in the application are implemented and achieved as a requirement of the consent conditions.

0.010

Riparian Margins

3.9 The proposed revegetation, offset and compensation package appears broadly proportionate to the scale of riparian habitat loss and should, over time, provide substantial replacement and enhancement of riparian ecological values.

0.011

3.10 The proposed monitoring and maintenance programme is also reasonably comprehensive, including regular inspections, ecological monitoring, adaptive management, weed control and replacement planting.

0.012

3.11 However, some uncertainty remains regarding whether the realigned channel will ultimately achieve the ecological functions of the existing densely forested stream corridor. The realignment assessment acknowledges that riparian vegetation will be managed to maintain access to the adjacent haul road and is therefore not expected to achieve the same density or diversity as the existing vegetation.

0.013

3.12 Greater certainty around future riparian width, canopy cover, stream shading and other performance outcomes would provide stronger confidence that the realigned stream will achieve comparable long-term ecological function, rather than simply establishing riparian vegetation cover.

3.13 As a result, the Department considers that moderate to high residual adverse effects on terrestrial vegetation and wetland values are likely to remain in the short to medium term and will need further conditions to ensure that similar ecological values can be potentially realised.

0.014

Freshwater Ecology

3.14 Dr. Amber McEwan has reviewed the application and has provided her technical assessment at Appendix 1. To summarise, Dr. McEwan mostly agrees with the assessment of ecological effects but considers the effects management, in areas, is insufficient to manage the effects of the activity to achieve no net loss.

3.15 Her assessment primarily focuses on whether the Mangapū stream alignment is considered to be remediation, or offsetting, in accordance with the effects management hierarchy. The difference is important to note, as if it is found to be offsetting, then greater management is required to ensure that there is no net loss of biodiversity. She further considers the effects of dewatering and cumulative impacts on the stream tributaries. The Stream Realignment Management Plan also proposes that the stream realignment is successful if it achieves the standards when the values stated are less than the tributary currently has, which would not achieve the overall objective no net loss.

- 3.16 The proposed offsetting approach relies on augmentation to prevent stream flows falling below Mean Annual Low Flow (MALF), on the basis that maintaining flows at or above MALF will prevent adverse ecological effects from dewatering. However, Dr McEwan considers that ecological effects associated with flow reduction are not necessarily confined to flows approaching MALF and may occur at higher flows where dewatering results in a substantial departure from the natural flow regime. 0.050
- 3.17 Reduced flows can affect habitat availability, aquatic biota and stream processes, including water temperature and the capacity of flows to buffer water-quality effects. Consequently, if dewatering significantly reduces flows but they remain above MALF, adverse ecological effects could occur before the proposed augmentation trigger is reached. This is particularly relevant given the range of permanent and intermittent habitats within the predicted zone of influence.
- 3.18 The dewatering management and monitoring framework should therefore provide for the identification and management of adverse ecological effects arising from dewatering across relevant levels of flow reduction, rather than relying solely on MALF as the threshold for intervention. Effects should be mitigated or otherwise managed as necessary. 0.051
- 3.19 Finally, the Applicant proposes to not provide for fish passage to tributaries 3 and 4 as the tributaries are proposed to be quarried later in another resource consent application at least 35 years out. The Applicant instead provides other offsetting and compensation to manage the effects of impeding fish passage.
- 3.20 The offsetting and compensation measures described by the Applicant are confusing. For example, the Applicant includes effects management measures for 'loss of fish passage' due to proposed culverts on tributaries 3 and 4. DOC has not addressed this in these comments because the Applicant has applied for complex freshwater fisheries approval in relation to these culverts and the Department has provided commentary on this in the section 51 report. 0.015
- 3.21 In addition, the Applicant includes offsetting and compensation for the loss of the tributaries themselves, but to the Department's knowledge this relates to future quarry expansion plans that are not consented or currently sought. A resource consent application cannot consider a potential future effect that has not been applied for, and it is inappropriate to offset or compensate for an activity that may or may not be consented in the future.
- 3.22 Discussions have occurred and will continue post section 53 comments between the Department and the Applicant to understand the exact effects of the Project.

Lizards

- 3.23 The Department has already commented extensively on lizards in its section 51 Wildlife Approval report and does not seek to repeat itself here.

- 3.24 It extends its appreciation to the Applicant for the amendments made to the Wildlife Approval application lizard management plan and lizard relocation to ensure that the elegant geckos are managed in accordance with the purpose of Wildlife Act 1953.

0.016

4 Comments on conditions

- 4.1 Overall, the Department has some concerns about the Project, subject to appropriate conditions. To that effect, the Department suggests some amendments to the conditions proposed by the Applicant to ensure that the effects are appropriately managed.
- 4.2 The Department has provided some preliminary comments on conditions where appropriate, but requests that further work on the conditions be undertaken by the Applicant, in collaboration with the Department, particularly in relation to freshwater ecology.

0.017

Management Plans

- 4.3 The Applicant has proposed several management plan conditions to manage ecological effects of the project. It is welcomed that the management plans have been provided with the application so the Department can assess the management techniques proposed. However, there is additional information required in the conditions to ensure that the objectives of the various management plans are achieved and that the outcomes sought are implemented.
- 4.4 The Panel Convenor's Practice and Procedure Guidance Note states at section 21 that it is strongly encouraged that the Applicant include other mechanisms to provide greater certainty.² The Applicant has already included several of the mechanisms for the conditions, however further changes are sought:
- 4.4.1 Inclusion of performance or environmental standards that specify the standard that must not be breached.
 - 4.4.2 Provision of trigger responses for resource use to occur provided specified environmental conditions exist.
 - 4.4.3 Monitoring of triggers and responses, including adaptive management responses.
- 4.5 The performance/environmental standards, trigger responses, and monitoring provisions recommended by the Department below have been taken from the equivalent management plans provided with the application. Therefore, as the Applicant has already proposed the performance/environmental standards, trigger responses, and monitoring triggers, including them in the conditions, it is no more onerous, to capture these as conditions.

0.018

² Fast-track Approvals Act 2024: Panel Conveners' Practice and Procedure Guidance 22 July 2025 at 21.1.

- 4.6 The Department recommends that they are pulled out from the management plans into the conditions as condition 1 of the consent says that “the Project must be undertaken in general (emphasis added) accordance with [...] the management plans”. 0.019
- 4.7 There is a possibility that, if the performance standards are not being achieved by the management plan, the Applicant amends the management plan to reduce the standards. Instead, they should be increasing the measures to meet the performance standards. This will better avoid, the situation where adverse effects are not appropriately managed. Including the performance standards in the conditions would ensure that the effects are appropriately managed. 0.020
- 4.8 Where possible in the timeframe provided, the Department has provided potential track-changes to the conditions below. Other specific requirements referenced above, such as performance standards to ensure that ecosystem values and systems are accounted for, will require further work after the section 53 process.

Ecological Management Plan

- 4.9 The Ecological Management Plan condition (condition 55-56) is largely supported. As discussed in paragraphs 3.4 – 3.5, longer-term ecological outcome performance standards would be beneficial to ensure that the ecosystem value of the mature indigenous forest can be achieved through offsetting and compensation.
- 4.10 Performance standards such as canopy closure are necessary to understand whether restoration planting has successfully established, but indicators such as:
- the development of multiple canopy layers,
 - the recruitment of larger trees,
 - the accumulation of coarse woody debris on the forest floor,
 - the natural regeneration of indigenous species (particularly species that were not originally planted),
 - increasing indigenous species diversity, and
 - evidence that native fauna such as birds and lizards are using the habitat
- are necessary to monitor to ensure that the values of mature indigenous forests are reproduced. These monitoring requirements do not need to occur upon the grant of consent but instead be implemented after the initial establishment has succeeded. 0.021
- 4.11 The ecological assessment has already established a useful dataset through the vegetation plots and surveys completed for the project. Setting up plots in the restoration/enhancement areas and comparing them over time with suitable reference areas of mature forest nearby and the previously collected data, would provide a way of assessing whether the restoration areas are meaningfully progressing towards the type of forest and the values that are cleared. 0.022

- 4.12 The Department recommends that the Applicant provide a condition that includes the requirement for mature forest values to be achieved within the life of the consent, and performance standards that must be achieved. The condition would help enforce the Ecological Management Plan as a long-term programme designed to achieve no net loss of indigenous biodiversity from the Project. The Department is willing to assist the Applicant with drafting such a condition/s.
- 4.13 There is minor amendment recommended to ensure that the required offsetting and compensation planting occurs before vegetation is cleared.³

0.023

56(h) timeframes for the implementation of Site Specific Planting Plans before Construction works occurs in the staged area;

0.024

Stream Realignment Management Plan

- 4.14 The objective for the Stream Realignment Management Plan condition 63 is not consistent with the objective in the corresponding draft management plan. The Department requests that the condition is amended as follows to match the management plan objective, and also recommends other wording changes to ensure the condition reads well:
63. *The objective of the Stream Realignment Management Plan is to ~~detail the process for the design, Construction, and long-term establishment of the Mangapū Tributary realignment in a way that:~~ realign and rehabilitate the Mangapū Stream Tributary in a manner that restores natural stream processes and form, enhances ecological values, and protects and strengthens the natural character of the waterway and its margins, while supporting long-term freshwater health and resilience and a culturally aligned freshwater ecosystem. This will be achieved by:*
- (a) ~~as far as practicable, replicate the channel form and function of the restored reach upstream, and the natural stream downstream; and mimicking natural channel morphology, hydrology and habitat diversity; and~~*
 - (b) ~~incorporates~~ incorporating riparian planting along the full extent of the realigned stream corridor, and revegetation on the quarried benches above using native species to enhance natural character and ecological function consistent with the certified Landscape Rehabilitation Strategy and Management Plan required by Condition 52;*
 - (c) ~~Supports a healthy, resilient, and culturally aligned freshwater ecosystem; and~~*
 - (d) ~~Ensures~~ Ensuring compliance with Conditions 106 – 108 and 121 – 124.*

0.025

³ Vegetation clearance is included in the term “Constructed work”.

Pest Management Plan

- 4.15 The pest management plan (PMP) is intended to control pest animals and pest plants to protect new plantings and existing mature bush areas within Site and within the offset and compensation sites. The Panel sought clarification of the PMP's timeframe and the Applicant has stated the PMP will be implemented for 35 years.
- 4.16 The Project's summary states that the application will enable the extraction of aggregate for a further 80 years. The plantings proposed by the Applicant are to be staged over the course of the 80 years, meaning that there will likely be young plants still requiring protection when the 35 year period ends, and therefore will require additional pest plant and animal control for a longer period. This is particularly important considering that time lag is an outstanding concern from the Department regarding the offsetting and compensation proposals. While the ecological values of mature indigenous forest cannot be immediately reproduced or created, pest management should continue past 35 years to ensure measures are in place for the life of the quarry.
- 4.17 It is acknowledged that approaches to pest control could vary over the course of 80 years. However, instead of limiting the pest control for 35 years, condition 63(k) should be updated to provide the ability to update the plan for changes in best practice for pest management.
- 4.18 The PMP condition 62 should implement the Table 6 and Table 8 from the Boffa Miskell Pest Management Plan submitted in support of the application. The targets within the Applicant's tables 6 and 8, have been stated to achieve the overall objective of the ecological management plan, to achieve no net loss of biodiversity. To assist monitoring of the consent conditions, and to ensure the activities are meeting the no net loss objective, the tables should be included in the consent conditions.
- 4.19 Further, the Department requests an amendment for the threshold for Feral Cats matches the response at section 10.1.1 of the PMP should be made, and there should be a specific link to the Auckland Council Regional Pest Management Plan, and its subsequent versions, to ensure that all applicable pest plants are included.

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0.029

~~62. The purpose of the Pest Management Plan (PMP) is to detail the measures and procedures to control pest animal's and pest plant's to protect new plantings and existing mature bush areas within Site and the offset and compensation sites. The objectives of the Pest Management Plan (PMP) are:~~

- (a) ~~To protect and enhance ecological values and connectivity at Winstone's Hunua Quarry and adjacent sites in Hunua Road and Judge Richardson Drive, and at the Meremere Quarry, through achieving sustained suppression of key target predators/pests at or below desired abundance targets within set timeframes over the lifespan of the consent.~~

0.030

- (b) To protect new enhancement plantings from target pest animal browsers during establishment of the enhancement planting areas, from the initial enhancement planting installation until 5 years after final planting is completed by management area.
- (c) To achieve removal of target invasive pest plants within enhancement planting areas prior to planting installations.
- (d) To achieve sustained control of pest plants at or below desired targets throughout all other pest management areas within set timeframes over the lifespan of the consent.

62A. The animal pest management required by condition 61 must meet the management targets and adhere to the thresholds for initiating additional control and monitoring frequency for each target species as set out in the following table:

<u>Pest Species</u>	<u>Management Target</u>	<u>Threshold</u>	<u>Monitoring frequency</u>
<u>Rats</u>	<u><5% CCI (year-round)</u>	<u>≥10% CCI (year-round)</u>	<u>Survey prior to and after each area knockdown and/or exceedance of threshold (if required).</u>
<u>Possums</u>	<u><3% CCI</u>	<u>≥5% CCI</u>	
<u>Hedgehogs</u>	<u><5% CCI</u>	<u>≥10% CCI</u>	
<u>Mustelids</u>	<u>5 detections per 2000 CH</u>	<u>>10 detections per 2000 CH</u>	
<u>Feral Cats</u>	<u>Zero detections</u>	<u>>1 detections per 2000 CH</u>	<u>Biannual surveys thereafter.</u>
<u>Rabbits and Hares</u>	<u>Modified McLean Scale (MMS) level 2 or below for 100% of survey lines</u>	<u>MMS level 3 on all survey lines</u>	
<u>Ungulates, Feral Deer, Pigs, and Goats</u>	<u>Reduction to less than 1/20ha of area</u>	<u>≥1/20ha of area</u>	<u>Timing to be determined by expert hunting contractor</u>

Advice note:

CCI = Chew Card Index

CH = Camera Hours

62B. The pest plant management required by condition 61 must manage plants that are compiled from the Auckland Council Regional Pest Management Plan 2020-2030, or any

other subsequent version, and updated accordingly on proposed baseline monitoring required in condition 63.

62C. The pest plant management required by condition 61 must meet the management targets and adhere to the thresholds for initiating additional control and monitoring frequency for each target species as set out in the following table:

<u>Management Area</u>	<u>Target</u>	<u>Threshold</u>	<u>Monitoring frequency</u>
<u>All pest management areas (excluding new enhancement planting areas years 1-5 after final planting installations by area).</u>	<u>zero detectability of mature/reproductive individuals.</u> <u>≤10m2 of vegetatively reproductive species.</u>	<u>≥10 mature/reproductive stage individuals per pest management area</u> <u>≥15m2 of vegetatively reproductive species</u>	<u>Annual surveys</u>
<u>New enhancement planting areas</u> <u>Zero detectability</u>	<u>Zero detectability of any mature/reproductive individual pest plants (years 1-5 after final planting installations by area)</u> <u>Target will shift to sustained suppression after year 5 onward for each new enhancement planting area.</u>	<u>Identification of one or more target pest plants will trigger control response during planting establishment period (year 1-5 after final planting installation by area).</u>	<u>6 monthly surveys for plants in years 0 to 3</u> <u>Annual surveys for plants in year 4 onward</u>

63. The PMP must include:

[...]

(j) A process for review of the PMP (and any subsequent re-certification in accordance with conditions 23 – 27 and 30 – 31) to adapt to any changes in the receiving environment and updates in best practice pest management practices.

Off-site visual mitigation planting

0.030

- 4.20 The Department recommends a new condition that all indigenous plants included in visual mitigation planting are sourced from the Hunua Ecological District.
- 131A. Native plants proposed in any Visual Mitigation Plan must be sourced from the Hunua Ecological District.

0.031

Bat Management

- 4.21 The Department considers that the Applicant's proposed bat conditions can be simplified by instead referring to the Department of Conservation Bat Roost Protocols. As vegetation clearance will be staged throughout the lifetime of the quarry being approximately 80 years, there is a possibility that bats return to the Hunua ranges. Referring to the Bat Roost Protocols allows the consent holder to implement the best method of minimising adverse effects on bats, particularly as methods are likely to adapt and change overtime. These amendments are as follows:
137. Prior to any vegetation clearance being must be undertaken must in accordance with the methodology specified in Protocols for minimising the risk of felling bat roosts (Bat Roost Protocols) Version 4: October 2024 approved by the New Zealand Department of Conservation's Bat Recovery Group or any subsequent version.
- ~~(a) all vegetation must be visually assessed by a Bat Specialist to identify any potential bat roosting areas; and~~
- ~~(b) if trees are identified as potential bat roost features (i.e., cavities, deadwood, loose bark and epiphytes), then acoustic surveys must be undertaken to confirm the presence/absence of bats; and~~
- ~~(c) if any bat roosts are identified all vegetation removal within 20 m of that roost tree must cease until it can be confirmed that the roost is no longer occupied. No felling must be undertaken of any tree with an active bat roost.~~

0.032

0.033

Ecological Offsetting and Compensation

- 4.22 The existing resource consents (Part G) require the covenants over the revegetation plantings to be Conservation Covenants pursuant to section 77 of the Reserves Act 1977 (RA). The new resource consent conditions should require that the covenants be Conservation Covenants as the RA specifies what values of the land are protected and what activities are prohibited in the Conservation Covenants.
139. The Consent Holder must ensure Conservation Covenants pursuant to section 77 of the Reserves Act 1977 are imposed on the Records of Title of sites that provide for the ongoing protection of the areas identified in the "Formal Legal Protection" column of Table 2.

0.034

Summary/Conclusions

0.035

4.23 The Department has only limited concerns about the activities of the Project under the resource consents sought, as the assessment of environmental effects provided is thorough.

It has some outstanding concerns about:

4.23.1 Whether the offsetting and compensation planting areas will achieve the same mature indigenous vegetation values that will be lost.

4.23.2 Stream realignment being considered as remediation rather than offsetting;

4.23.3 The cumulative impacts of dewatering the headwaters of the Slippery Creek catchment on the lower reaches of the Mangapū stream,

4.23.4 The appropriateness of not providing fish passage to tributaries 3 and 4 to benefit an activity not currently consented.

4.24 The Department is open to continue discussions with the Applicant as the Project progresses through the Fast-track system, and it welcomes the opportunity to comment further on draft conditions either through dialogue with the Applicant or through the formal section 70 process.

5 Appendices

Appendix 1) Hunua Quarry: S53 technical advice regarding freshwater ecology

Appendix 1

TO: Christina Brodnax, Department of Conservation

FROM: Amber McEwan, Riverscapes Freshwater Ecology Limited

CC: Emily Bayliss

DATE: 02.08.2026

Re: Hunua Quarry: S53 technical advice regarding freshwater ecology



Note on tributary focus

The EclA discusses values and effects in relation to three tributaries: Trib 1 is the Mangapū tributary proposed to be realigned and Tribs 3 and 4 are other Mangapū Stream tributaries that are subject to potential effects on fish passage and we have addressed these in our S51 report. The applicant makes mention of future (unconfirmed as far as I understand) plans to also quarry Tribs 3 and 4 and includes offsetting measures in relation to this in the present application. It would be difficult for me to justify spending time considering an activity that may or may not happen, so my comments in this memo are restricted to proposed activities relevant to the present application – in terms of stream loss, this means only 'Trib 1' / 'Mangapū tributary'). I wanted to clarify this in case the absence of discussion related to Tribs 3 and 4 here gave the impression that I did not have concerns – to be clear, I would have concerns if the quarrying of these tributaries (i.e. permanent loss) was an activity currently under consideration.

0.036

S53 comments

1. Document review

To prepare the below advice, I reviewed the following documents:

- B12.4.5(a&b) Ecological Impact Assessment (EclA) – accessed from the Fast Track website on 01.08.26
- B12.4.6a Mangapū tributary realignment – preliminary design and effects technical report – accessed from the Fast Track website on 01.08.26
- B12.8.12 – Groundwater Monitoring and Contingency Plan (updated version accessed from the Fast Track website on 02.08.26)
- B12.4.9a – Development Groundwater Effects Assessment (accessed from the Fast Track website on 02.08.26)

- Memo to DOC (attention Amber McEwan) from the Applicant’s ecologist (Ian Boothroyd) dated 9 July 2026.
- B12.7 – Conditions – 14 July

2. Ecological values present

The EclA describes forested permanent and intermittent streams that include barriers to passage of non-climbing fish species, and that are vulnerable to scouring by high flows. The downstream catchment is highly modified and developed. The applicant proposes to realign 1200 m² of the Mangapū tributary (often referred to as Trib 1 in the application material) and describes the ecological value of this reach as ‘Very High’.

The eDNA sampling detected longfin eel, shortfin eel, banded kōkopu, kōura, and two species of *Zephlebia* that are classified as At Risk – ‘Naturally Uncommon’ in Trib 1. I did not find discussion of regional threat classifications in the documents, and the report has applied a superseded⁴ national threat classification for banded kōkopu. The main consequence of this is that assessments and effects management calculations have been performed with banded kōkopu assigned a status of ‘Not Threatened’, whereas the current national status of this species is ‘At Risk – Naturally Uncommon’. Banded kōkopu are not threatened within the Auckland region, but this is due to the region being classified as a banded kōkopu stronghold (and home to more than 20% of the national population)⁵.

I consider that the surveying carried out by the applicant in relation to the Mangapū tributary is adequate but could be improved by the addition of physical survey methods, as recommended by Melchior & Baker (2024⁶). I also agree that the Mangapū tributary should be considered of ‘Very High’ ecological value, but I note that the addition of a further ‘At Risk’ and regionally significant species should increase the ecological value (but may not be required to in this situation, which highlights a problem with classification ‘ceilings’.)

0.037

⁴ The current threat classifications are available in Dunn, N.R.; Closs, G.P.; Crow, S.K.; David, B.O.; Goodman, J.M.; Griffiths, M.; Hicks, A.S.; Hickford, M.J.H.; Jack, D.C.; Kitson, J.C.; Ling, N.; Waters, J.M.; Wylie, M.J.; Hitchmough, R.A.; Mānaki, T. 2025: Conservation status of New Zealand freshwater fishes, 2023. New Zealand Threat Classification Series 46. Department of Conservation, Wellington. 66 p.

⁵ Regional threat classifications are available in Bloxham M, Woolly J, Dunn N, Chaffe A, Tutt C, Melzer S 2023. Conservation status of freshwater fishes in Tāmaki Makaurau/Auckland. Auckland Council Technical Report 2023/13.

⁶ Melchior, M., & Baker, C. (2023). Environmental DNA guidelines and field protocols for lotic systems (NIWA Client Report No. 2023279HN). National Institute of Water & Atmospheric Research Ltd

3. Effects assessment

3.1 Assessing effects of realigning Mangapū tributary

The EclA describes the proposal to infill 1770 m² of the Mangapū tributary and create a new 693 m² channel between the upstream and downstream reaches of Slippery Creek. The report describes the permanent loss of stream extent and value as a 'significantly adverse effect'. I agree with this but also think that it does not adequately reflect the level of effects. I would consider the total and permanent loss of 'Very High' value habitat to be – at the point of impact – as adverse as an impact could possibly be.

0.038

3.2 Assessing the cumulative effects of loss of stream extent

The Mangapū tributary reach proposed for realignment is of very high ecological value, and as such is also rare in the Slippery Creek catchment and the Manukau Ecological District. The EclA mentions the cumulative loss of high quality stream reaches, but only to briefly note that it is a reason (among others) that an ECR greater than 1 is justified for offsetting/compensation.

0.039

Given the above, I consider it important that the application include discussion regarding the cumulative impact of the loss of headwater extent and value (that are not being like-for-like replaced regarding extent) related to ongoing quarrying activities. Presumably at some point, cumulative losses will reach a level that requires avoidance, and it is appropriate that this is acknowledged and taken into account during planning and decision-making, rather than each loss being considered in an isolated context as an adverse effect for which compensation is an option.

3.3 Assessing the effects of dewatering

The EclA describes the potential reductions in flow that Symonds Hill pit dewatering could cause in multiple parts of the catchment (EclA Table 20 pasted below for reference), some of which could be severe.

Table 20: Changes in flow loss compared with existing consent at Hunua Quarry (from PDP 2026b) 10

Catchment	Predicted reduction in baseflow for existing consent (m³/d)	Predicted reduction in baseflow for proposed development (m³/d)	Change (m³/d)	Percentage increase in flow loss (%)
Taitaia Stream	311	549	238	76.5
Waipokapū Stream	2099	2290	191	9.1
Mangapū Stream	1053	946	-107	-10.2
Waihoihoi Stream	564	610	46	8.2
Hingaia Sub-Catchment	76	89	13	17.1
Papakura Sub-Catchment	23	36	13	56.5
Total	4127	4520	394	9.5

The EclA appropriately discusses the potential effects of this on habitat availability, periphyton, fish, invertebrates, and buffering capacity in relation to water quality, temperature, and turbidity. The report describes the effects of dewatering as a ‘significant adverse effect’, which I agree with, although I would add that cumulative effects of flow reduction in the catchment could also warrant consideration if quarrying activities have caused this effect previously, and may cause further similar effects in future.

0.040

4. Effects management

4.1 Managing loss of stream extent and value at the point of impact

The effects management approach outlined in the EclA characterises the constructed channel as remediation for the effect of infilling the natural channel, whereas DOC’s position regarding stream realignment is that the infilling of a stream reach represents a total loss that requires like-for-like offsetting. According to Quinn et al. (2021)⁷:

“Some ecological effects can be mitigated easily at the point of impact while others cannot. ...where a stream channel is permanently infilled, the effects of habitat loss and loss of ecological function cannot be easily mitigated as the stream will cease to exist at the point of impact.”

The application explicitly refers to the infilling as “unavoidable loss” but then proposes to remedy this loss by “moving the stream”. This view seems less suitable than viewing the infilling as a loss to

0.041

⁷ Quinn, J. Baber, M, Markham, J, Ussher G, Lowe, M and Goldwater N (2021). Defining mitigation: an ecology perspective. Resource Management Journal, Resource Management Law Association.

be offset - particularly given the uncertainties associated with habitat recreation in the constructed channel⁸ and the low suggested indicative performance targets for the new channel⁹.

To further explain the difference between these approaches:

In basic functional terms, the proposed realignment in this case involves the infilling of 1770 m² of stream and replacing it with 693 m² of stream (i.e. 1077 m² less). A mitigation-based approach to managing the effects of stream realignment would involve:

- Remedying the **temporary loss of 693 m² of stream extent and value** by 'moving the stream', and avoiding/minimising time lag associated with habitat development in the new channel. And,
- Offsetting or compensating for the **permanent loss** of the remaining 1077 m² of **stream value** with ecological rehabilitation intended to represent like-for-like replacement or appropriate compensation measures. And,
- Compensating for the **permanent loss** of 1077 m² of **stream extent** with appropriate compensation measures (or emphasising avoidance where appropriate based on cumulative effects).

0.041

Whereas an offsetting approach would involve:

- Offsetting the **permanent loss** of 693 m² of **stream extent and value** with like-for-like replacement (the constructed channel), including accounting for time lag associated with habitat development in the new channel. And,
- Offsetting or compensating for the **permanent loss** of 1077 m² of **stream value** with ecological rehabilitation intended to represent like-for-like replacement or appropriate compensation measures. And,
- Compensating for the **permanent loss** of 1077 m² of **stream extent** with appropriate compensation measures (or emphasising avoidance where appropriate based on cumulative effects).

In terms of specific measures proposed in the present application:

⁸ Section 10.4.1 of the EciA describes design principles for the constructed channel but includes many uses of phrases like 'as much as possible/practical', indicating that outcomes are uncertain.

⁹ Section 10.6.5 of the EcIA describes indicative performance standards for the constructed channel that are low compared to the 'Very High' value of the reach being lost.

The EclA proposes that the loss of 1077 m² of stream extent and value be remedied by constructing a new channel and attempting to recreate habitat values, with (it is not made clear but I assume) the remaining effect on value arising from time lag minimised by staged livening. The latter has merit as a concept provided that there is reasonable certainty that no net loss of stream value and extent would occur during the transition period. Certainty is not currently available, however, and there is risk that the new channel will not provide equivalent ecological value for quite some time – and possibly never based on the relatively low indicative performance targets suggested in Section 10.6.5. The progressive flow reduction in the impact reach may also temporarily reduce value there (as less habitat is available, and potential impacts result from reduced dilution potential and increased negative biotic interactions from overcrowding). The converging nature of these outcomes is one of the principles that supports the investigation of staged livening as a process, and comprehensive monitoring and reporting of the process could contribute to improving future management of the adverse effects of stream realignments.

0.042

I found the description of offsetting/compensation activities confusing based on the approach of *“...integrating and aggregating the mitigation and offsets/compensation to maximise environmental outcomes as much as practicable.”*

I wasn't able to systematically assess the proposed offset and compensation measures because I found it too difficult to confidently establish what actions were being proposed to manage what effects. For example, section 9.10 describes offset and compensation locations and actions in some detail but also says that these details are not relevant to the Mangapū tributary realignment, which is covered in Section 11. Section 11 relates to CFFA, but Section 10 focusses on the realignment (so I assume that is just a typo). However, this section notes the need for offsetting related to Mangapū tributary loss, but refers back to section 9.10 for details. The offsetting/compensation proposal also incorporates measures related to effects of activities that are not part of the activities currently under consideration (the quarrying of tributaries 3 and 4).

0.043

I understand that the permanent loss of 693 m² of stream extent and value is proposed to be offset and compensated for by the enhancement of 2860 m² of existing streams based on an ECR of 4.13¹⁰. The applicant describes three specific enhancement activities, and acknowledges that not all proposed activities are easily quantifiable:

- *Planting riparian vegetation along stream margins.*
- *Re-establishing connectivity and linkages to and between reaches of existing watercourses.*

¹⁰ Or 4.8 - Appendix 15 reports an ECR of 4.8 in the text, but 4.13 in the table.

• *Removal of willow, blackberry and other woody weeds from reaches of streams and rehabilitation with native riparian vegetation.*

I make the following comments in relation:

- Presumably the quantification process counts ‘woody weed removal and replacement with native vegetation’ and ‘riparian planting’ separately, so as not to risk double counting. 0.044
- Presumably the comment regarding less quantifiable enhancement activities¹¹ does not mean that ‘benefits for threatened species’ or ‘enhancements to spawning sites’ are being counted separately, because they are outcomes that will occur as a result of the more quantifiable activities (riparian and barrier rehabilitation), so counting them as providing additional benefit could risk double counting. 0.045
- Presumably all proposed barrier remediation relates to culverts that the applicant does not have an existing statutory responsibility to fix¹², or are already likely to be remediated as part of Auckland Council’s wider barrier remediation programme (crossover could risk additionality). 0.046
- Presumably barrier remediation activities will both 1) meaningfully increase the ability of more migratory native fish species (compared to the status quo) to access higher value upstream habitats, and 2) not increase the ability of introduced fishes to access more habitats. More detailed planning may be necessary to ensure that barrier remediation achieves its intended objective and does not cause secondary effects in relation to species’ distributions. 0.047

In addition, I consider it appropriate that the ECR calculations are revisited with a view to incorporating the significance of banded kōkopu, and the potential value of the impact site – with the latter based on the possibility that it may contain a higher diversity of native fishes in future as a 0.048

¹¹ Section 9.10.1 of the EclA: “We have used the area calculations within the site of biodiversity loss (i.e., stream area loss as the residual effects of the proposed pit development) to inform the proposed offset/compensation but have not relied on the quantifications alone as the method as benefits for aquatic ecosystems can be derived from the management of other attributes that are not incorporated into the ECR/SEV methodology (e.g., improvements to fish passage, benefits for threatened species, enhancements to spawning sites).”

¹² Freshwater Fisheries Regulations 1983 – Regulation 42(2): “The occupier of any land shall maintain any culvert or ford in any natural river, stream, or water (including the bed of any such natural river, stream, or water in the vicinity of the culvert or ford) in such a way as to allow the free passage of fish”

result of downstream barrier remediation (which is a specific restoration opportunity identified by Auckland Council¹³).

0.048

4.2 Managing the cumulative loss of 'Very High' value stream reaches

As noted above, the EclA mentions the cumulative loss of high-quality stream reaches, but only as brief note that it is one of the reasons that an ECR greater than 1 is justified. Presumably this would have happened anyway, so I am unsure if this effect (that the proposed activities are contributing to) has actually contributed to the ECR value. It would be good for the applicant to clarify whether they are proposing specific measures to manage this effect.

0.049

4.3. Managing the effects of dewatering

The applicant proposes to remedy the effects of dewatering by augmenting flows to ensure that levels do not drop below Mean Annual Low Flow (MALF), and considers that no residual effects on aquatic ecological values will remain. I disagree with this opinion, because ecological effects associated with flow reduction are not confined to flows approaching MALF and could occur at a range of flow reduction levels. For example, Richter et al. (2012)¹⁴ proposed a presumptive standard under which alteration of natural flows by 10–20% provides only a moderate level of ecological protection, and ecological risk increases further where alteration exceeds 20%. If dewatering significantly reduces base flows and adverse effects result, then these effects will presumably remain unaddressed until levels decline to MALF.

I raised this concern during discussion with the applicant's ecologist on 9th July 2026. The applicant responded in a later memo¹⁵ with their opinion that providing augmentation to prevent stream flow dropping below MALF is the only adverse effect that needs to be managed. The applicant identifies that the relevant objective in this context is to "prevent adverse effects from dewatering" and I agree with this – but I do not agree with the following assertion that "maintaining flows at or above MALF achieves that objective".

I consider that preventing adverse effects from dewatering will require the consideration of a range of other effects (which were identified earlier in the EclA) of dewatering in relation to the ecological

¹³ Ingleby, R., Rieger, A., Magee, J., Reeves, E., Macintosh, K., Lowe, M., Young, D. (2016) Watercourse Assessment Report: Slippery Creek Catchment. Morphum Environmental for Auckland Council.

¹⁴ Richter, B.D., Davis, M.M., Apse, C. & Konrad, C. (2012). A presumptive standard for environmental flow protection. *River Research and Applications*, 28(8), 1312–1321.

¹⁵ Memo to DOC (attention Amber McEwan) from the applicant's ecologist (Ian Boothroyd) dated 9 July 2026.

context of the zone of influence – including intermittent reaches, and in relation to other levels of flow reductions. Effects should be mitigated or otherwise managed as necessary.

5. Proposed conditions

I commented on proposed conditions relating to the Aquatic Fauna Salvage and Relocation plan, detailed design, and monitoring and reporting in my S51 memo. I have looked over the current draft and have no further comment.

Gerald Masters and Anita Masters

Email: [REDACTED] Phone: [REDACTED]

11 August 2026

The Expert Panel, Hunua Quarry Development
c/- Environmental Protection Authority
By email: substantive@fasttrack.govt.nz
Private Bag 63002, Waterloo Quay, Wellington 6140

Re: Invited comments on the Hunua Quarry Development (FTAA-2603-1185), sections 53 and 54, Fast-track Approvals Act 2024

We are the owners and occupiers of [REDACTED]. We have been invited by the Expert Panel (Minute 2, 14 July 2026) to comment on the Hunua Quarry Development, because our property is assessed in the application as subject to moderate-high adverse visual effects and is offered off-site mitigation planting. We appreciate the opportunity to comment and set out our comments below within the time allowed.

Please note

We are giving these comments so that the effects on our property can be considered by the Panel. They are NOT written approval of the application, NOT a waiver of any concern or future right, and NOT agreement that the effects on our property have been, or will be, adequately avoided, remedied or mitigated. Any future dealings or planting agreement with the applicant should be treated the same way.

0.001

1. Our position

We recognise that aggregate is an important resource and that the applicant has a genuine case for the quarry. We are not trying to oppose that case in principle. Our concern is with the direct, long-term effects of the expansion on our own property, and whether the proposed conditions are strong enough to manage them.

0.002

Our position is straightforward. We are not asking the Panel to turn the quarry down. We are asking that, if it is approved, the conditions we set out in section 8 be made part of that approval. Where an effect on our property cannot be properly fixed by a condition, we oppose the application on that point. For each concern we raise, we have set out the specific condition we are asking for, as the Panel invited commenters to do.

0.003

2. Our property and its relationship to the quarry

[REDACTED] is on the western side of the proposed Symonds Hill Pit expansion, in the applicant's Western W1 viewing group, roughly 125 to 500 metres from the works. We look toward the quarry to the east and north-east, across the Symonds Stream valley. Our property is directly across the [REDACTED]. While [REDACTED] sits partly between us and the quarry, the application still identifies [REDACTED] as separately affected. The existing screening between us and the quarry includes mature poplars, which are deciduous, so they give much less screening in winter, which is when the quarry is most visible.

0.004

3. Visual and amenity effects

The applicant's own Landscape Effects Assessment names [REDACTED] among the W1 properties with moderate-high adverse visual effect during operation, easing to moderate only after mitigation and only over a ten-year establishment period. We accept that rating. We ask the Panel to weigh the following points.

0.005

- **There is no visual simulation taken from [REDACTED].** The nearest one (Visual Simulation B) was taken from the road junction near 68, 80 and 144 Judge Richardson Drive, at a surveyed ground level of 104.8 metres, looking east across the 108 Judge Richardson Drive paddock. Our house and main outdoor living areas sit well above that road-level point. Because the camera is lower than our house and set away from it, it does not show what we actually see: from our house we look over the tops of the trees in between and see more of the pit and the quarry faces. We ask that a site-specific assessment be done from our house and outdoor living areas.
- **The applicant's documentation is inconsistent about this viewpoint.** It is described in the location plan and baseline panorama as Viewpoint 15 at the entrance to [REDACTED], but the montage figures are titled [REDACTED], and the two carry different photography dates. We ask the applicant to confirm exactly where Visual Simulation B was taken and to confirm the viewpoint is representative of affected W1 dwellings.
- **The mitigation shown is not planting on our land.** Each mitigated montage is captioned as planting on the Judge Richardson Drive offset site (land the camera looks across), plus rehabilitation planting on the quarry benches. The simulations do not depend on, or depict, any screening on [REDACTED].
- **The effect is real and long-lasting.** Even the applicant's best-case Stage 7 image shows a broad, pale quarry face dominating the skyline. The biggest change happens at Stages 7 and 8, which the applicant puts at around year 35 and later. Noticeable replanting is not expected until those stages, and planting on the quarry benches does not even begin for at least 35 years, then takes decades to grow. The difference between the raw and the softened Stage 8 images comes mostly from that bench planting, which is decades away. So for a very long time our actual view will be closer to the unmitigated images.
- **Key panels are missing, and seasonality is not addressed.** There is a Stage 7 image with mitigation but none without, so the effect of mitigation at the governing stage cannot be tested. The base photographs are summer views, so they understate the winter outlook when the deciduous screening thins. We ask that the applicant provide an unmitigated Stage 7 simulation, a simulation representative of the view from [REDACTED], and leaf-off (winter) simulations, or at least state the base photograph dates.

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0.007

0.008

0.009

0.010

0.011

4. Off-site mitigation planting

We welcome the offer of off-site mitigation planting in principle, and we would work constructively with it. But as it stands, the offer is not enough to deal with the effects of a quarry this large, running for this long. Our reasons are below, and we ask that the offer be strengthened and made enforceable.

0.012

- **The maintenance obligation is far too short.** The current methodology only requires the consent holder to replace dead plants for the first three months, after which maintenance falls to the landowner. Three months is not a credible establishment period for planting intended to screen a quarry operating for decades. By contrast, the applicant's own conditions apply a five-year maintenance period and a 90

0.013

percent establishment standard to the quarry's own offset and rehabilitation planting. We ask that the same standard apply to planting on our property.

- **The offer should be enforceable, not optional.** Off-site planting for [REDACTED] should be a binding consent obligation, not a promise the consent holder may or may not honour, and it should be able to be implemented before, not after, the stage that materially increases visibility.
- **Design should be led by effect, not by a fixed 5 metre width.** Screening depends on height and density, and on a screen placed to intercept the actual sightlines from our dwelling. Where the assessed effects justify it, the funded planting should be able to be wider or denser than the 5 metre default, and should be evergreen where year-round screening is required.
- **We should approve the design.** The species, location, height, density and design should be approved by us and should not unreasonably remove valued non-quarry views.

0.014

0.015

0.016

5. Dust and air quality

The air quality assessment identifies [REDACTED] as a residential receptor, and Judge Richardson Drive properties are frequently downwind. The greatest dust risk is identified at Stage 4, during major overburden removal. The modelling may be sound, but the conclusions depend on operational controls being maintained consistently over decades and on there being an enforceable response when monitoring or residents' experience shows controls are inadequate. We ask for the conditions in section 8 covering independent monitoring, public reporting, triggers, and suspension of high-dust activity in adverse conditions.

0.017

We also want to acknowledge what the applicant already does well. It holds regular meetings with local residents, currently about every six months, and shares its dust and vibration monitoring openly, including the times when its limits have been exceeded. We value that honesty, and it has built trust. Because it is voluntary at present, we ask that it be secured as a condition, so it continues for the life of the expanded quarry and through any change of owner or operator.

0.018

6. Noise, blasting and vibration

A quarry of this scale involves blasting, crushing and haulage over the life of the operation. We ask that the conditions address blast frequency, airblast and ground vibration limits, advance notification to our property, the location of monitoring, permitted hours, and a pre-commencement property condition survey so that any later damage can be assessed against a baseline.

0.019

7. Stream, ecology and cumulative effects

The proposal removes a high-value reach of the Mangapu Stream tributary and replaces it with an engineered channel, supported by a temporary bridge and heavy haulage for several years. We support strong, independent monitoring and transparent reporting of these enabling works. More generally, we ask the Panel to keep in mind that this is not a short construction project but decades of changing operational effects on our property, and that conditions should be able to respond as effects actually emerge.

0.020

8. Conditions we request

If consent is granted, we ask that the following conditions (or conditions to similar effect) be imposed.

Visual mitigation planting for [REDACTED]

1. That off-site mitigation planting for [REDACTED] be an enforceable consent obligation, able to be implemented before the stage that materially increases visibility, rather than an optional offer. 0.021
2. That a site-specific visual assessment be undertaken from the dwelling, principal outdoor living areas and key viewshafts at [REDACTED] (not from a road-level viewpoint) to inform the planting design. 0.022
3. That the owners approve the species, location, height, density and design; that planting be evergreen where year-round screening is required; and that it not unreasonably remove valued non-quarry views or interfere with normal use of the property. 0.023
4. That the consent holder fund all design, ground preparation, stock protection and fencing, watering, weed and pest control, and replacement, for at least five years or until defined performance standards are met, mirroring the standard the conditions set for the quarry's own planting. 0.024
5. That performance standards include at least 90 percent healthy establishment, height and density sufficient to achieve year-round screening of agreed viewshafts, and independent landscape-architect certification. 0.025
6. That the funded planting be able to be wider or denser than the 5 metre default where the assessed effects justify it. 0.026
7. That, if planting cannot provide effective mitigation without unacceptable effects on the property, an alternative mitigation process be available. 0.027
8. That acceptance of planting not constitute written approval of the application, settlement of effects, or waiver of any right, including the right to make complaints. 0.028

Dust, noise and operations

9. That dust be independently monitored near W1 receptors, with results made readily available to residents, defined triggers, enforceable corrective action, and suspension of high-dust activities in specified wind or dryness conditions, particularly during Stage 4. 0.029
10. That blasting conditions set blast frequency and airblast and vibration limits, require advance notification to [REDACTED], specify monitoring at or near the property, limit operating hours, and require a pre-commencement property condition survey. 0.030

Rehabilitation, review and liaison

11. That rehabilitation be completed as benches become available, with stage-specific time limits and annual public reporting, rather than open-ended deferral. 0.031
12. That the applicant's existing community meetings (at least six-monthly) and its open sharing of dust and vibration monitoring results, including any exceedances, be secured as conditions and continued for the life of the expanded operation, together with a complaints process with named contacts, logging, response times and reporting to Auckland Council. 0.032
13. That the conditions be able to be reviewed before later stages if actual effects exceed predictions, with the ability to require additional mitigation. 0.033
14. That the applicant provide an unmitigated Stage 7 simulation, a simulation representative of the view from [REDACTED], and winter (leaf-off) simulations, and confirm the exact location of Visual Simulation B. 0.034

9. Conclusion

We are not seeking to stop the supply of aggregate. We are asking that, if this expansion proceeds, the effects on our home over the coming decades be properly assessed and firmly conditioned, and that the mitigation offered to us be made real, enforceable and durable. We would welcome the opportunity to comment on the draft conditions of consent in due course, and we confirm we wish to be sent those draft conditions.

0.035

0.036

Thank you for considering our comments.

Yours faithfully



Gerald Masters

Owner and occupier of [REDACTED], authorised to make these comments on behalf of both owners (Gerald Masters and Anita Masters).

Comments on the Hunua Quarry Development Fast-track Application

Project: Hunua Quarry Development

Applicant: Winstone Aggregates (a division of Fletcher Concrete and Infrastructure Limited)

To the Expert Panel,

I wish to lodge my objection to the Hunua Quarry Development application under the Fast-track Approvals Act 2024.

As a neighbouring landowner and resident, I have significant concerns that the proposed expansion of quarrying activities will result in unacceptable adverse effects on the surrounding community, rural environment, and neighbouring properties. In my view, these effects have not been adequately avoided, remedied, or mitigated.

My property has a direct view into the quarry pit. I therefore experience the effects of the quarry firsthand and am particularly concerned about the consequences of any further expansion of its operations.

1. Noise Effects

The proposed expansion has the potential to increase noise associated with quarry operations, including blasting, crushing, screening, heavy machinery, reversing alarms, and truck movements.

Although the applicant has provided technical noise assessments, I am concerned that modelling and compliance measurements do not necessarily reflect the actual day-to-day experience of residents living near the quarry. In a rural environment, quarry noise can be particularly noticeable and intrusive, especially during early mornings, evenings, and still weather conditions.

I have personally heard quarry-related noise as early as approximately **5:30 a.m.** This is inconsistent with the peaceful rural environment that neighbouring residents reasonably expect to enjoy. I was understanding that Symonds Hill quarry was only supposed to be operational at 7am

Operational noise adversely affects, or has the potential to adversely affect:

- the use and enjoyment of our property;
- peaceful rural living;
- outdoor activities;
- sleep and wellbeing; and
- the overall amenity values of the area.

I do not consider the proposed mitigation measures sufficient to adequately protect neighbouring residents, particularly if quarry operations are expanded.

0.001

2. Dust and Air Quality

Dust generated from quarrying, blasting, crushing, stockpiles, exposed quarry surfaces, and heavy vehicle movements is a major concern.

Of particular concern is that **even on weekends when the quarry is not operating**, we can experience substantial dust during windy conditions. At times, thick dust settles on roofs and vehicles, and we have experienced significant silt accumulation in our water tanks.

This raises serious questions about the effectiveness of existing dust controls and the potential for the problem to worsen if quarrying activities are expanded.

Dust has the potential to:

- settle on homes, buildings, roofs, water tanks, vehicles, and outdoor areas;
- contaminate or adversely affect rainwater collection systems;
- affect gardens, pasture, and vegetation;
- reduce local air quality; and
- create health concerns for residents.

The application does not, in my view, provide sufficient assurance that dust emissions can be effectively controlled, particularly during dry and windy conditions when dust generation and dispersal may be at their greatest.

0.002

3. Visual and Landscape Effects

The proposed quarry expansion will further industrialise what is otherwise a rural landscape.

My property has a **direct view into the quarry pit**, making visual effects a particularly significant concern for me.

Expanded quarry faces, stockpiles, machinery, lighting, earthworks, and associated infrastructure will further alter the visual character and amenity of the surrounding area.

These visual effects do not stop at the quarry boundary. They directly affect neighbouring residents who live with views of the quarry and diminish the rural and natural landscape values of the area.

While mitigation planting may be proposed, vegetation can take many years to mature and may never fully screen large quarry faces, exposed rock, machinery, stockpiles, and other quarry infrastructure.

0.003

4. Blasting, Vibration and Structural Damage

One of my most serious concerns relates to blasting and its effects on neighbouring properties.

Existing and future blasting has the potential to cause:

0.004

- vibration affecting neighbouring properties;
- cracking of building foundations;
- cracking of walls and other parts of buildings;
- cracking or damage to driveways and other structures;
- damage to farm buildings and infrastructure; and
- ongoing concern regarding the structural integrity of neighbouring properties.

This concern is based on my **actual experience**, not simply a hypothetical future risk.

I have observed damage at my house that I believe has been caused by blasting associated with the quarry. I have attached photographs/evidence of this damage to my comments.

I previously submitted a remediation proposal to Winstone regarding this damage. However, Winstone did not accept responsibility, advising that its blasting was within monitored limits.

0.005

This response is a significant concern. Compliance with a monitored vibration limit does not, by itself, resolve the question of whether damage has occurred or what caused that damage. Nor does it provide an adequate remedy for a neighbouring property owner who reasonably believes their property has been damaged as a consequence of quarry operations.

If the expansion is approved, neighbouring residents should not be placed in the position of having to establish damage after the event without an agreed independent baseline condition of their properties.

I therefore request that the Panel require:

0.006

- independent pre-blast structural and condition surveys of potentially affected neighbouring properties;
- photographic and written documentation of existing cracks and structural conditions;
- periodic follow-up surveys throughout quarry operations;
- independent monitoring of blast vibration at appropriate & various neighbouring properties, not just the homestead;
- transparent access for affected residents to relevant blast monitoring records;
- a clear and independent procedure for investigating complaints of property damage; and
- an enforceable mechanism requiring the quarry operator to remediate or compensate for damage where quarry operations are determined to have caused or materially contributed to that damage.

Given my previous experience attempting to have property damage addressed, I consider these protections particularly important.

5. Groundwater and Water Table Concerns

I am concerned that expansion and deepening of quarrying activities could alter groundwater systems and underground water tables.

Potential impacts include:

- lowering of groundwater levels;
- changes to natural groundwater flows;
- impacts on private water supplies and bores;
- effects on springs, wetlands, and nearby streams; and
- long-term environmental consequences that may not become apparent for many years.

These effects are particularly concerning because changes to groundwater can be difficult or impossible to reverse once they have occurred.

In my view, the application does not provide sufficient certainty that these risks have been fully understood or that appropriate safeguards will be in place throughout the life of the quarry and following its eventual closure.

If approval is granted, groundwater monitoring should be independently undertaken before, during, and after quarrying activities, with clearly defined baseline conditions and enforceable trigger levels requiring investigation and operational changes where adverse effects are detected.

There should also be clear responsibility for restoring or replacing affected private water supplies if quarry operations are found to have adversely affected them.

0.007

0.008

6. Wider and Cumulative Environmental Effects

The proposal raises wider environmental concerns, including:

- cumulative degradation of the surrounding environment;
- effects on native vegetation and wildlife habitat;
- increased sediment and stormwater runoff;
- increased heavy vehicle movements;
- increased emissions associated with quarrying and transportation; and
- further industrialisation of a rural area.

It is important that these effects are not considered only in isolation.

The cumulative effect of decades of noise, dust, blasting, vibration, traffic, landscape modification, groundwater risk, and other environmental impacts may be considerably greater than the apparent significance of any individual effect considered separately.

I therefore ask the Panel to consider the **combined and cumulative effects** of the proposal on neighbouring residents and the surrounding rural environment.

0.009

7. Quality of Life and Rural Amenity

The combined effects of noise, dust, blasting, traffic, vibration, visual impacts, and environmental degradation have a direct effect on the quality of life of residents living around the quarry.

People choose to live in this rural area because of its peaceful environment, clean air, open landscape, and rural character.

0.010

Further expansion of quarrying activities risks substantially diminishing those values.

These adverse effects are also not temporary. They may continue throughout the remaining life of the quarry, potentially for many years, with some environmental and landscape effects continuing beyond the cessation of quarrying.

For neighbouring residents, this means potentially living with the consequences of an expanded industrial activity for a significant portion of their lives.

8. Concerns Regarding the Fast-track Process

I am also concerned that the Fast-track Approvals process provides more limited opportunities for public participation than would ordinarily be available through other consenting processes.

0.011

Given the scale, duration, and potential long-term effects of this proposal, it is particularly important that the experiences and concerns of neighbouring landowners and affected residents are given substantial weight.

0.012

Technical reports and predictive modelling are important, but they should not displace the real-world experiences of people who already live alongside the quarry and experience its existing effects.

My concerns regarding noise, dust, blasting, visual effects, and property damage arise from living next to the existing quarry operations. These experiences should be carefully considered when assessing predictions about the effects of an expanded operation.

Conclusion and Relief Sought

For the reasons outlined above, I respectfully request that the Expert Panel **decline the Hunua Quarry Development application**.

0.013

I am concerned that the proposed expansion would impose significant and long-lasting adverse effects on neighbouring residents, properties, rural amenity, and the surrounding environment, and that the proposed mitigation measures do not provide sufficient certainty that these effects will be adequately avoided, remedied, or mitigated.

If the Panel is nevertheless minded to grant approval, I respectfully request that stringent and enforceable conditions be imposed, including, at a minimum:

- stricter controls on blasting frequency, timing, and vibration;

0.014

- independent pre-operation and ongoing structural/condition surveys of potentially affected neighbouring properties; | 0.015
- independent monitoring of blasting and vibration; | 0.016
- transparent provision of relevant blast-monitoring information to affected residents; | 0.017
- comprehensive dust monitoring, including monitoring at appropriate neighbouring properties, with enforceable limits and trigger levels; | 0.018
- stricter operational noise controls, including appropriate restrictions on early-morning operations; | 0.019
- ongoing independent noise monitoring, noting that I have heard quarry-related noise from approximately **5:30 a.m.**; | 0.020
- independent groundwater and surface-water monitoring, including baseline monitoring before expanded operations commence; | 0.021
- clear groundwater trigger levels requiring investigation and corrective action; | 0.022
- regular independent environmental audits; | 0.023
- a robust, transparent, and independently reviewable complaints process; | 0.024
- meaningful and enforceable mechanisms for addressing non-compliance and adverse effects; | 0.025
- clear financial responsibility for remediation or compensation where quarry activities are determined to have caused or materially contributed to damage to neighbouring properties; and | 0.026
- periodic review of conditions and monitoring requirements where actual adverse effects exceed those predicted in the application. | 0.027

In particular, I ask the Panel to consider my experience with suspected blasting-related damage to my property. I previously raised this matter with Winstone and submitted a remediation proposal, but responsibility was not accepted on the basis that blasting was said to be within monitored limits. In my view, this demonstrates why reliance on monitored compliance alone is insufficient and why an **independent property-damage assessment and resolution process** is necessary. | 0.028

I ask the Expert Panel to give substantial weight to the cumulative impacts on neighbouring residents, including the long-term loss of rural amenity, environmental values, property enjoyment, and quality of life.

Attachments:

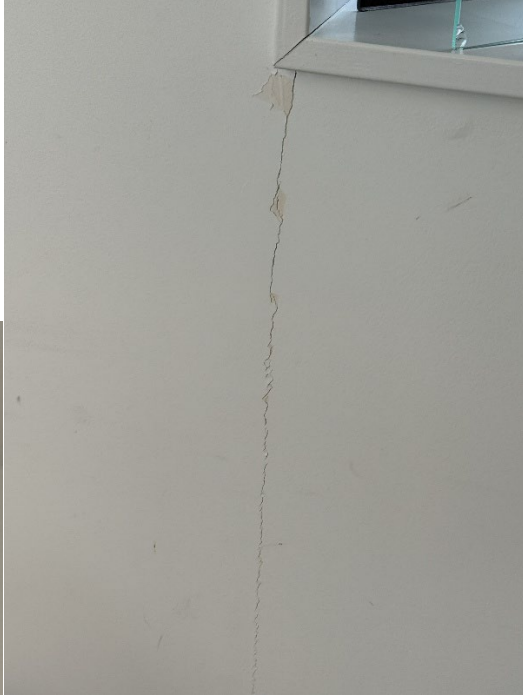
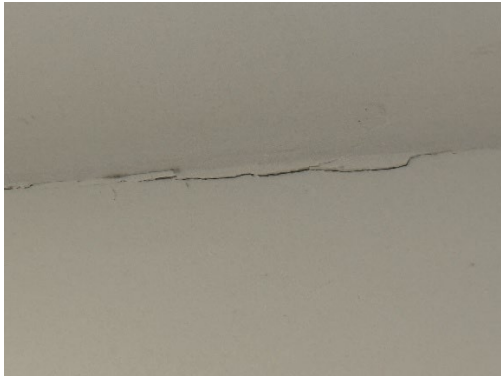
Photographs/evidence of damage to my property which I believe is associated with quarry blasting, which we have had assessed.

Thank you for considering my comments and the experiences of those living directly alongside the quarry.

Yours faithfully,

Paul & Vivienne Manak

[Redacted signature]











Submission on the Fast Track Application by Winstone Aggregates for the Development of the Hunua Quarry

Reference: FTAA-2603-1185

Submitter:

BD & CM Park

Property Impacted by Quarry, current and future.

To Fast Track Panel

1. Consultation

We were not directly contacted by Winstone re this proposed development and only became informed via another family member neighbour of the Winstone properties, and the fast Track notification letter 14 July. On meeting with Winstone planners in March 2026, their explanation for not directly contacting us was our property was unoccupied, despite this information being readily available on Auckland Council GIS property information and the fact that we are on the Quarries contact list for blasting notification and neighbour consultation, regularly attending meetings at the quarry where we maintained our current contact details. A poor show and indicative of Winstone attitude to neighbours, those directly affected by Winstone activities.

0.001

2. Quarry Life

We were active by our involvement with the HEPSI group in submission on the current consent application, 8730, for the development of the Symonds Hill (RIP) pit. At that time, we requested information from Winstone and the Regulators as to next staging for the Quarry, however this was not relevant as the consent was only for a duration of 35 years, yet it was obvious that further development was intended, as this application confirms.

0.002

Referenced in the AEE is the development of an “End of Quarry” strategy. This should be part of this consideration in assessing this consent approval as the effects of the quarrying operation will endure beyond any consent. Affected parties have the right to know.

3. Mangapū Stream Flows

By way of background. We have owned this property for many years now, and prior to our ownership the land was owned by CK & ME Franks and operated as a dairy farm up until its subdivision circa 1990. Up until September 2024, we, together with other Franks family members, operated the land residual to that subdivided, Kauri View Road, as a dry stock farming operation, run from [REDACTED]. We drew water for stock watering from a surface “take” from the Mangapū Stream for the dairying, and subsequent dry stock farming operations. The “take” is located at approx. 200m downstream of the Kauri View Road culvert and continues in use by the now owner of [REDACTED].

The resulting development of the Symonds Hill pit, has seen substantial change in the landscape with the Hill being quarried to what is now a deep pit. The quarrying/excavation has had a significant impact on the residual flow in the Mangapū stream, due to cutting off of streams, springs, perched

0.003

water tables, lowering of the regional water table and the natural surface catchment of the stream. To us, as operators of a farming operation requiring a “take” for stock watering, this has been obvious and noticeable, especially during periods of low flow during summer and other dry spells – not necessarily defined 1 Dec to 31 March. Whilst anecdotal, this impact has been obvious requiring us to build rock weir(s) to ensure our water intake was submerged. Conversely high flows also result in flooding Kauri View Road, Jack Paterson Road, Sutton Road and are a matter of record with Council. To us the stream response time in high flows has increased significantly. These issues have been raised at quarry consultation meetings, with no feedback received. Further, the purposed diversion of the Mangapū Stream and the steepening of the stream gradient will further exacerbate high flows response.

0.004

0.005

In reviewing this consent application, the AEE report, Flow Augmentation B3.9.3.4 Cl 318/319 and Groundwater Monitoring and Contingency Planning section Appendix B12.8.12, it is clear that no work prior to the Symonds Hill consent was done to properly characterise the Mangapū catchment in order to inform conditions required to maintain minimum stream flows required for stream health and aquatic life and specify minimum offset compensation requirements. It is noted that the consent requires that the stream be monitored **twice only** during periods 1 Dec to 31 March at nominated locations and that if flows drop 5% below MALF then the pumped compensation system at Coalmine Road be brought into service. Retroactive not proactive responsive. I am quite incredulous, given my own personal experience in operating and managing compensation flow systems at Watercare’s Hunua Dams that ensure adequate stream flows compensating for flow disruption resulting for the dam’s construction. Winstone Consultants and Auckland Council regulators should have, and do have, far better understanding and capability to assess, stream characterisation and environmental effects and requirements and design mitigation systems. It is surprising that a monitoring weir has not been constructed, and is not proposed, that provides continuous flow monitoring that informs and enables control of a proper compensation system, example Hunua and Waitakere water supply dams. A potential site could be Kauri View Road culvert. Too expensive? Small dollars relative to the quarry development proposals and the long-term benefits to the stream environment.

0.006

It is clear from this section of the AEE re groundwater that there is significant impacted potential anticipated on bores and stream flow due to excavation of the pit to -75mRL, it is therefore a logical interpretation that surface water stream flow will also be impacted.

A properly designed and engineered stream monitoring and compensation control flow system should be a minimum requirement of any consent, including a comprehensive stream hydrology characterisation and environment assessment, albeit retrospective, correcting a flaw in the current consent.

0.007

4. Quarry Extension South East

It is proposed that the quarry zone boundary be extended to now include the what is described B2.4.4 cl. 88, 89, 90 and B2.10 cl. 134, 135, in the AEE 38.2ha of and elsewhere, Outstanding Natural Landscape, Regional Threatened “Endangered” Tawa, Taraire, Kānuka podocarp vegetation of High Value natural character. This area covered under SEA-T-5323 designation within the Auckland Council Unitary Plan. 134,

It was required under the current 2009 consent that this area be covenanted however, Winstone have chosen not to do so knowing that this will conflict with the future development. We consider this a quite cynical and reflects Winstone attitude to protection of high value environment

demonstrated when they constructed the block plant adjacent to the crusher plant that required clearing of significant stands of pristine forest.

HEPSI strongly resisted at the time the extension of this quarry footprint into this area. MOE also at the time in their submission noted the high value natural vegetation of this area. We have not been able to access the MOE submission to this application as it is redacted on the website.

Whilst this may significantly increase the volume of aggregate extraction, we contend that this comes at a high price environmentally, both flora and fauna. Loss of the Symonds Hill vegetation significantly native bird life desecration of their habitat. Once lost, despite offset mitigation, the recovery over time is many generations, if ever. The overall quarry footprint as it exists will yield significantly, it will require advancement of staging in other areas to the NW.

Throughout this section of the AEE the high-quality nature of the flora and fauna contained within this area and significant periphery areas are well described and reflective of the area. The Panel is urged to take cognisance of this in its decision. A helicopter view of this is recommended.

Further, this proposal includes diversion of the tributary to the Mangapū stream. This is a major and destructive of this pristine environment and should not proceed. As described within the AEE, the increased gradient will impact stream flow characteristics. The process leading up to the current consent was flawed in that it did not require that a comprehensive assessment and characterisation of the Mangapū stream catchment be undertaken and the assessment of effects of the quarry development over time on the stream.

The extension of the quarry zone into this area and the diversion of the Mangapū stream should not be approved.

0.008

5. Mitigation Offset Planting

Section B7.2.3.1 Cl. 534-539 describes the offset mitigation strategy for loss of 44.6ha of indigenous forest. Mitigation planting of 96.7ha is required to meet offset guidelines (cl536). Significant offset planting is proposed at locations out of region, 29.4ha at Meremere Quarry and within the Hunua Regional Park, Mangatawhiri River. These together with pest control.

We would contend that any offset planting and associated pest control should be undertaken within the region proximate and adjacent to the quarry with the objective of offsetting the degradation of the Ponga Road ONL resulting from the loss of the once prominent Symonds Hill landscape feature and other historic land use activities including Papakura Council refuse dump. Adjacent to the Freidman Block is the Kauri View reserve, an area of recovering indigenous forest that has plenty of enhancement potential. When viewed from Ponga, Opaheke and Sutton Roads, and even distant Whangapouri Road in Karaka, there are obvious opportunities to enhance the Ponga Road ONL in the immediate vicinity west and northwest of the quarry. Our property at [REDACTED] has approximately 60% of 8ha fenced and protected from livestock and contains well established and recovering indigenous forest that presents an opportunity for further enhancement, as are other adjacent properties. We would be prepared to discuss this opportunity with Winstone or with Auckland Council. These properties could be integrated with the adjacent Kauri View reserve. Noting that including these adjacent areas within mitigation zones supports the "Quarry Buffer Zone" which has never been defined and has always been seen as threat to any development of adjacent land.

0.009

The beneficiaries of out-of-region planting and pest control at Meremere are Fletcher Concrete and that local environment, but not the Hunua quarry environment where the actual loss as proposed by this application and historically. Mitigation measures proposed for the Hunua Regional Park are

0.010

supported as they are in-regional, however this should not be undertaken at the expense of the maximising the offset possible in the immediate vicinity of the quarry, Ponga Road ONL.

Due to the poor management of the Refuse dump operated by Papakura District Council pest control is a challenge beyond the resources of adjacent land owners and the significant population of feral cats and rats impacting on native bird species. Whilst not Winstone responsibility, it is Auckland Council reasonability to mitigate the long-term effects of the refuse dump operation. A joint effort of pest management in the wider interest of future protection and enhancement by Council and Winstone should be considered.

0.011

Offset mitigation planting and pest control initiatives must be undertaken on land immediately adjacent to the quarry, and not out of region areas as proposed, with the objectives of enhancing the Ponga Road ONL mitigating for the loss of the indigenous forest, as proposed by this application, and the historic loss of Symonds Hill significant landscape forest cover.

0.012

6. Transport System Affects

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

0.013

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.

7. Conclusion

We have raised a number of issues, not exhaustive, in this submission of concern. We feel that this Fast Track process does no allow or enable adequate consultation or opportunity for communication and does not collective encourage community inputs, rather a divide and conquer approach.

0.014

However, we make this submission based on concerns, as neighbours to the quarry for more than 50 years. The creeping nature of this quarry development since 2009 that has diminished the rural nature and our surrounding environs with the loss of significant indigenous forest cover that characterised the Ponga Road ONL. The clear and obvious impact on the Mangapū stream flows and health during the frequent extended periods of low flow have directly impacted on us.

0.015

We are prepared to make personal submission to the panel in support of this submission.

0.016

Yours faithfully



Brian Park

Contact details:

Brian & Kate Park

[Redacted contact details]





Comments on project under the Fast Track Approvals Act 2024

Hunua Quarry Development, FTAA-2603-1185

Contact Details	
Organisation Name	Heritage New Zealand Pouhere Taonga (HNZPT)
Contact person	HNZPT Fast-track Team
Contact Number	(04) 470 8053
Email	fasttrack@heritage.org.nz

Introduction

1. Winstone Aggregates (Applicant) has lodged an application for the Hunua Quarry Development (project) under the Fast-track Approvals Act 2024 (the FTA Act).
2. HNZPT was consulted prior to the Applicant lodging its substantive application.
3. There are no listed heritage places located within the project area.
4. The Applicant has applied for an archaeological authority as part of the substantive application.
5. In accordance with section 53(2)(k) of the FTA Act, Heritage New Zealand Pouhere Taonga (HNZPT) has been invited to comment on the substantive application as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014.

Comments on Application

Archaeological Authority

6. HNZPT has provided comment in relation to the archaeological authority in its s51 Report dated 28 July 2026. 0.001
7. In summary, HNZPT has recommended that the archaeological authority be granted subject to recommended conditions; and that Ellen Cameron is approved as the person to undertake the archaeological work under this authority. 0.002
8. HNZPT and the applicant worked together to achieve an agreed set of conditions, which are included in Appendix A of the s51 Report. 0.003
9. While compiling our s51 report, HNZPT noted an inconsistency in the proposed buffers within the archaeological management plan (AMP) included in the application (Appendix B12.8.2 Hunua Quarry Development Archaeological Management Plan). 0.004
10. The applicant was advised of the inconsistency and have sent through an amended management plan dated August 2026, appended to these comments (Appendix One). 0.005



11. HNZPT recommends that condition 2 of the agreed conditions appended to its s51 Report is updated as follows:

0.006

Archaeological Management Plan

All works must be undertaken in accordance with the Archaeological Management Plan prepared by Ellen Cameron titled “Archaeological Management Plan: Hunua Quarry, Auckland Prepared for Winstone Aggregates dated ~~March 2026~~ August 2026 (AMP).

The Authority Holder may update the AMP by submitting the amended AMP in writing to HNZPT for its written approval.



HERITAGE NEW ZEALAND
POUHERE TAONGA



ARCHAEOLOGICAL MANAGEMENT PLAN: PROJECT MAHITAHĪ, PROPOSED HUNUA QUARRY EXPANSION, AUCKLAND

Prepared for Winstone Aggregates

August 2026

By

Ellen Cameron MSc

Clough
& ASSOCIATES LTD

321 Forest Hill Rd,
Waiatarua, Auckland 0612
Telephone: (09) 8141946
Mobile [REDACTED]
www.clough.co.nz

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INTRODUCTION

Purpose

Winstone Aggregates are proposing to expand and deepen the existing Symonds Hill Pit within the Hunua Quarry to secure additional high-quality greywacke resource and extend the operational life of the quarry out to approximately 50 - 80 years. The project will occur in eight stages. This archaeological management plan will cover the first 3 stages of the project over a period of ten years (to ensure that all works for the stages will be covered in case of delays to the programme) as shown in Table 1.

An archaeological assessment of the effects of the project was prepared:

Cameron, E. and T. Clough-Macready. February 2026. Proposed Hunua Quarry Development: Archaeological Assessment. Clough & Associates report prepared for Winstone Aggregates.

The assessment established that while no archaeological sites would be affected, although unlikely, it is considered possible that unidentified subsurface archaeological remains associated with Māori occupation and settlement, particularly in the area in the vicinity of the Mangapū/ Symonds Stream and tributary.

An application for a general Authority is therefore being made for risk management purposes for the first 3 stages of the project prior to the start of earthworks. This will ensure that if any remains are exposed during the proposed works appropriate action can be taken and any delays will be minimised.

This archaeological management plan outlines the procedures to be followed during archaeological monitoring of earthworks and procedures for recording any archaeological evidence before it is modified or destroyed. It also provides protocols for the exposure of archaeological remains including kōiwi tangata (human remains) or taonga tūturu (Māori artefacts). The area to be covered under the authority is shown in Figure 1.

Table 1. Stages to be covered under the authority with description of works and approximate duration

Stage	Activity	Works required	Approximate duration (yrs)
1	Enabling Works- Tributary realignment and construction of access road	Vegetation clearance and earthworks for removal of overburden.	4
	Extracting and processing- Stripping Campaign to the northwest. Already consented, occurs concurrently with the tributary realignment	Vegetation clearance and earthworks for removal of overburden.	
2	Enabling Works- Stream realignment completed Construct Western Haul Road	Vegetation clearance and earthworks for removal of overburden.	1
3	Extraction and processing- Incremental stripping campaigns: south from current pit crest towards stream diversion down to 120RL.	Vegetation clearance and earthworks for removal of overburden.	3

Project Archaeologist

The 'Project Archaeologist' referred to in this plan is the archaeologist approved by Heritage NZ under section 45 of the HNZPTA.

Some of the archaeological work may be undertaken by other qualified archaeologists under the direction of the Project Archaeologist. The general term 'Archaeologist' is used to denote either the Project Archaeologist or a qualified archaeologist working under their direction.

Aims of Monitoring, Investigation and Recording

It is considered possible that unrecorded archaeological sites associated with Māori occupation and settlement will be encountered during the works. Any archaeological remains, particularly shell midden, could possibly provide material suitable for dating and also material that could provide information on past environments through specialist analysis. It is important that this information is recovered prior to the removal of archaeological deposits and features to offset the loss of the site/s.

Māori Cultural Values

Archaeological sites of Māori origin have cultural value to tangata whenua in addition to the archaeological values provided for in this plan.

Contact details for representatives of iwi that have an interest in the sites within the project area are provided in this document, as are protocols that must be adhered to if archaeological remains of Māori origin are exposed. In carrying out the requirements of the authority the archaeologists will be guided by the Iwi representatives in matters of tikanga.

Winstone Aggregates or their designated representative should ensure that the iwi representatives are informed at least 48 hours before the start of the works requiring archaeological monitoring.

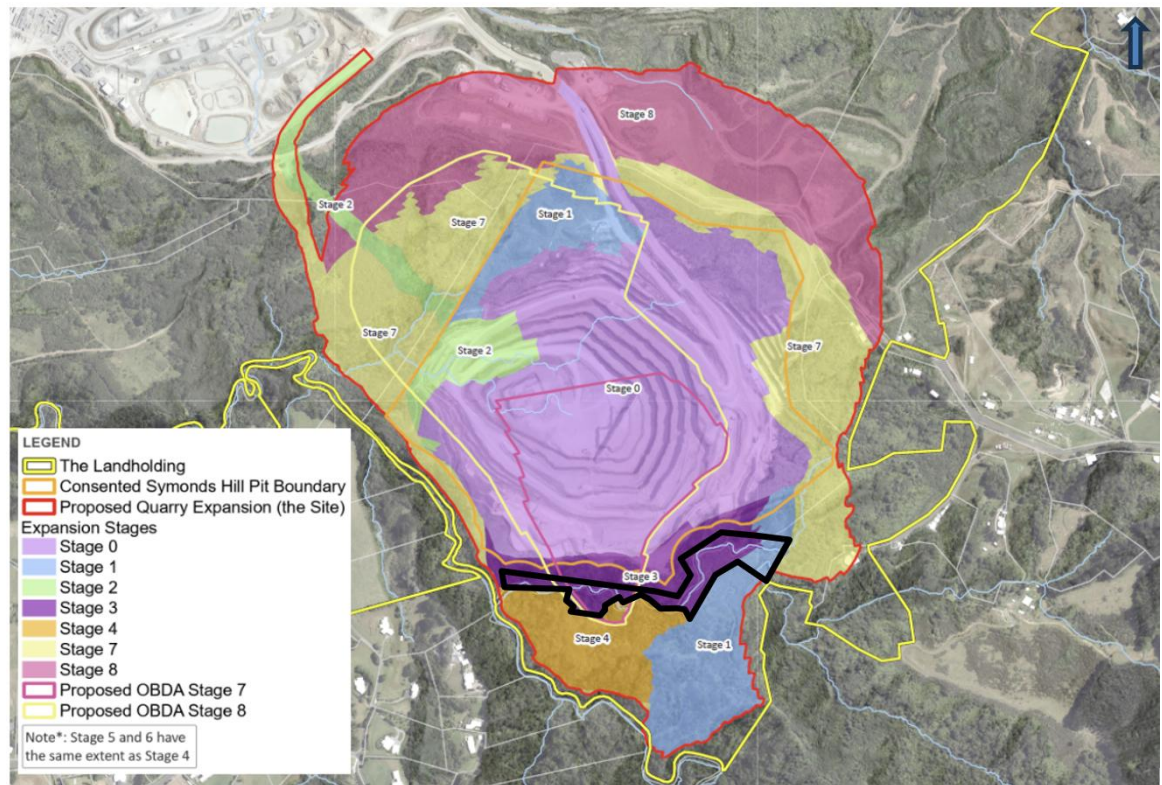


Figure 1. Plan showing area covered by the authority for Stage 1 – Stage 3 (red outline) and area of archaeological monitoring outlined in black (source: Winstones)

SITE MANAGEMENT

Pre-Start Requirements

1. Prior to the start of earthworks, the Project Archaeologist will be called to meet the Contractor on site to brief them on the archaeological requirements.
2. The Archaeologist will ensure that the Contractor/Project Manager have a copy of the Authority and Archaeological Management Plan, and will provide confirmation to Heritage NZ that they have been received and understood, either by providing copies of both documents signed by the relevant parties, or by obtaining email confirmation from them, copied to Heritage NZ.
3. The Project Archaeologist must be given at least 2 weeks' notice by the Contractor that works are about to begin.

Earthworks Phase

1. Monitoring of all preliminary excavations required for the project in the area shown on Figure 1 will be carried out by a qualified Archaeologist, to determine whether pre-1900 archaeological remains are present.
2. Monitoring will continue until the natural deposits have been reached (where excavations are continued to this depth), or until it becomes clear that the area has been modified to the point where no archaeology would be expected.
3. If in situ archaeological features or deposits are identified during monitoring, the Archaeologist will stop works in the immediate vicinity by notifying the Contractor.
4. Any in situ archaeological deposits or features exposed during monitoring, that cannot be avoided, will be investigated, recorded and sampled by the Archaeologist consistent with accepted archaeological practice and in accordance with the requirements of the Heritage NZ authority. Detailed notes of each feature and deposit will be made, photographs will be taken, and all subsurface features located will be detailed on the site plan. Stratigraphic drawings and photographs of features and deposits will be undertaken. Any artefacts will be retained for analysis and their positions marked on the site plan.
5. Additional Archaeologists will be brought to site as required to assist in the monitoring, and for the subsequent archaeological recording and sampling.
6. The Contractor will allow sufficient time and opportunity for the recording and sampling of any archaeological features or deposits encountered. The Archaeologist(s) will record the archaeological feature(s) or deposit(s) as quickly as possible so that earthworks may resume without undue delay.
7. If suspected archaeological deposits or features are identified at times or in areas where the Archaeologist is temporarily not present, the Contractor must stop works (within 20m) and follow the procedure set out below.
8. Heritage NZ will be advised by the Project Archaeologist if any significant archaeological features or deposits are exposed that were not anticipated. This will trigger the stand down procedure set out below.

9. Any significant archaeological features exposed will be retained in situ if feasible following investigation and recording.
10. If archaeological remains relating to Māori occupation are exposed, the Project Archaeologist will inform the appropriate Iwi representatives (if not present).
11. If human bone (kōiwi tangata) or taonga tūturu (Māori artefacts) are encountered, the protocols set out below will be followed.

Procedures if Archaeological Sites are Exposed when the Archaeologist is not Present

If the Archaeologist is temporarily not present and remains are exposed that are potentially archaeological features or deposits (as described to the Contractor at the pre-start meeting), the following procedure should be adopted:

1. The Contractor will ensure that earthworks shall cease in the immediate vicinity (within 20m) while the Archaeologist is called in to establish whether the remains are part of an archaeological site as defined under the HNZPTA.
2. If the Archaeologist confirms that it is an archaeological site, the area of the site will be defined by the Archaeologist and excluded from earthworks.
3. The archaeological site will be investigated and recorded by the Archaeologist in accordance with accepted archaeological practice and the conditions of the authority.
4. Heritage NZ will be advised by the Archaeologist if any significant archaeological features or deposits that were not anticipated are exposed.
5. If the archaeological site relates to Māori occupation the appropriate Iwi representatives will be informed by the Archaeologist (if not present) prior to investigation.
6. If human bone (kōiwi tangata) or taonga tūturu (Māori artefacts) are unearthed the protocols set out below will be followed.

Protocols Relating to Kōiwi Tangata (Human Remains)

If bone material is identified that could potentially be human, the following protocol will be adopted:

1. Earthworks/investigation should cease in the immediate vicinity while an Archaeologist establishes whether the bone is human.
2. If it is not clear whether the bone is human, work shall cease in the immediate vicinity until the University's reference collection and/or a specialist can be consulted and a definite identification made.
3. If bone is confirmed as human (kōiwi tangata), the Archaeologist will immediately contact Iwi representatives (if not present), Heritage NZ and the NZ Police.
4. The site will be secured in a way that protects the kōiwi as far as possible from further damage.
5. Consultation will be undertaken with all Iwi representatives as outlined in the authority, the Heritage NZ Regional Archaeologist and the authority holder to

determine and advise the most appropriate course of action. No further action will be taken until responses have been received from all parties, and the koiwi will not be removed until advised by Heritage NZ.

6. The Iwi representatives will advise on appropriate tikanga and be given the opportunity to conduct any cultural ceremonies that are appropriate.
7. If the Iwi representatives are in agreement and so request, the bones may be further analysed by a skilled bio-anthropological specialist prior to reburial, in line with the *Heritage NZ Guidelines Kōiwi Tangata Human Remains* (2014).
8. Activity in that place can recommence as soon the bones have been reinterred or removed, and authorisation has been obtained from Heritage NZ.

Protocols Relating to Taonga Tūturu (Māori Artefacts)

Māori artefacts such as carvings, stone adzes, and greenstone objects are considered to be taonga (treasures). These are taonga tūturu within the meaning of the Protected Objects Act 1975. Taonga tūturu may be found in isolated contexts, but are generally found within archaeological sites. If taonga tūturu are found the following protocols will be adopted:

1. The area containing the taonga tūturu will be secured in a way that protects the taonga as far as possible from further damage, consistent with conditions of the Authority.
2. The Archaeologist will then inform Heritage NZ and the Iwi representatives so that the appropriate actions (from cultural and archaeological perspectives) can be determined.
3. These actions will be carried out within the stand down period specified below, and work may resume at the end of this period or when advised by Heritage NZ or the Archaeologist.
4. The Archaeologist will notify the Ministry for Culture and Heritage of the find within 28 days as required under the Protected Objects Act 1975. This can be done through the Auckland War Memorial Museum.

The Ministry for Culture and Heritage, in consultation with the tangata whenua, will decide on custodianship of the taonga tūturu (which may be a museum or the iwi whose claim to the artefact has been confirmed by the Māori Land Court). If the taonga tūturu requires conservation treatment (stabilisation), this can be carried out by the Department of Anthropology, University of Auckland (09-373-7999) and would be paid for by the Ministry. It would then be returned to the custodian or museum.

Post-Earthworks Phase

1. Any artefacts recovered and samples taken will be analysed and recorded by the appropriate specialists.
2. Any taonga tūturu will be notified to the Ministry for Culture and Heritage in accordance with the Protected Objects Act 1975.
3. The Project Archaeologist will provide a report to Heritage NZ within 20 days of the completion of archaeological work. This may be the final report if no or limited archaeological remains are found.

4. If more extensive remains requiring detailed analysis are found, the Project Archaeologist will complete a full monitoring report within 12 months of the end of the archaeological work and will provide it to Heritage NZ and other parties identified in the Authority.

ARCHAEOLOGICAL TEAM AND OTHER CONTACTS

Archaeological Team

Ellen Cameron will direct the project as the Section 45 archaeologist. Fieldwork will be carried out by her or under her supervision.

The archaeological team will include some or all of the following:

Name	Role	Responsibility
Ellen Cameron	Section 45 Archaeologist	Manage project in field and prepare report
Jen Low	Archaeologist	Monitoring, recording
Tom Clough-Macready	Archaeologist	Monitoring, recording

Other qualified archaeologists and/or specialists may be brought in to the project if required. These may include specialists in particular categories of artefact or other remains.

Contact Details

Project Archaeologist	Ellen Cameron: [REDACTED] ellencameron@clough.co.nz		
Heritage NZ Regional Archaeologist	Greg Walter: (09) 3079924 GWalter@heritage.org.nz		
Auckland Council	Chris Mallows (Cultural Heritage Implementation Team Leader): [REDACTED], Chris.Mallows@aucklandcouncil.govt.nz		
Iwi Contact	Ngāti Te Ata	Karl Flavell	[REDACTED]
	Ngāti Tamaoho	Edith Tuhimata	[REDACTED]
	Te Ākitai Waiohū	Jeff Lee	[REDACTED]
	Ngāi Tai Ki Tamaki		kaitiaki@ngaitaitamaki.iwi.nz

STAND DOWN PERIODS

Depending on what is revealed by the earthworks, stand down periods may be required at various stages to allow for archaeological work to be carried out or for consultation with the appropriate parties may be required at various stages.

Stand down will require earthworks to cease only in the immediate vicinity of the feature or find, and work may proceed in other areas. The following maximum stand down periods will apply, but earthworks may be resumed earlier if the required work has been completed.

Timeframes need to be flexible enough to ensure that archaeological works are completed as necessary to ensure that the conditions of the authority are met.

Trigger	Stand Down Period	Requirements	Release
Archaeological feature, deposit or artefacts	Up to 1 day within each area where remains are found (maximum 2 days), but work may continue in areas where no remains are identified	Sufficient time must be allowed for the Archaeologist to investigate and record the remains.	Work resumes when the Archaeologist advises the Contractor that work is completed
Significant archaeological feature, deposit or artefacts ¹	Up to 3 days for a response from Heritage NZ, and up to 3 days for any detailed investigation required	The likely requirement is a mitigation investigation and/or recording by standard archaeological techniques, but this will be advised by Heritage NZ.	Work resumes when the Archaeologist advises the Contractor that work is completed
Human bone found	As agreed between the project manager, Heritage NZ and Iwi	Heritage NZ and NZ Police to be satisfied that koiwi identification is correct. Iwi representative(s) to organise reinterment or removal of bones from site and appropriate cultural ceremonies.	Work resumes following reinterment or removal of bones from site and when authorisation from Heritage NZ has been received.
Taonga, or archaeological remains of Māori origin found that were not anticipated	Up to 3 days	Heritage NZ and Iwi representative(s) to be consulted on appropriate action. Archaeological recording as required	Work resumes when the Archaeologist or Heritage NZ advises the Contractor that work is completed

¹ i.e. with the potential to provide significant information through detailed investigation

CONSENT HOLDER AND CONTRACTOR'S RESPONSIBILITIES

Authority Holder's Responsibilities

Winstone Aggregates or their designated representative has the following responsibilities:

1. To advise Heritage NZ of the start and finish dates of any required archaeological work.
2. To ensure that sufficient time is provided to carry out any archaeological investigations required.
3. To provide sufficient site security to ensure that archaeological material on site is protected from unlawful excavation or removal.
4. To ensure that a copy of the archaeological Authority is kept on site and its contents are made known to all contractors and subcontractors.
5. To ensure that a copy of this Archaeological Management Plan is kept on site and its contents are made known to all contractors and subcontractors.
6. To ensure that the conditions and protocols outlined in the Authority and this document are observed by Contractors and subcontractors.
7. To provide a safe environment for the archaeologists to carry out their work.
8. To provide an annual written report containing a summary of the progress to the Heritage New Zealand Pouhere Taonga regional archaeologist, Ngāti Te Ata, Ngāti Tamaoho and Te Ākitai Waiohū.

Contractor's Responsibilities

The Contractor's responsibilities are as follows:

1. To meet the Project Archaeologist on site prior to the start of works for a briefing on the archaeological requirements.
2. To provide the Project Archaeologist with 2 weeks' notification that project earthworks are about to begin, and to ensure that an Archaeologist is present when earthworks begin in the areas requiring monitoring shown in Figure 1.
3. To comply with the protocols above if archaeological sites, koiwi or taonga (pp. 5-6) are exposed.
4. To allow the Archaeologists sufficient time to investigate and record any archaeological remains before resuming works in the immediate vicinity.
5. To ensure a safe working environment for the Archaeologists.

DISPUTE RESOLUTION

Disputes fall into a number of categories but are usually the result of poor communication between the developer, subcontractors, Iwi representatives and the project archaeologists. Most can be avoided if sufficient detail of the archaeological issues and responsibilities is outlined in the tender document or work management documentation.

Common examples of a dispute are: that the subcontractors consider that the archaeologists are causing unacceptable delays, or that the archaeologists feel they have insufficient time to fulfil the obligations of the authority. In the event of a dispute relating to the Authority investigation the following procedure for resolution should be followed:

1. If the dispute relates to archaeological issues, a meeting between the Authority holder (or designated representative), Contractor or subcontractor and Archaeologists should be convened as soon as possible to attempt to resolve the dispute.
2. If the dispute relates to cultural issues, a meeting between the Authority holder (or designated representative), Contractor or subcontractor, Iwi representatives, and Archaeologists should be convened as soon as possible to attempt to resolve the dispute.
3. If the dispute cannot be resolved a further meeting of all parties with representatives of Heritage NZ will be arranged within 1 working day to resolve the dispute. Heritage NZ has ultimate responsibility for resolving issues relating to the conditions of the Authorities it issues.

Taonga tūturu (Māori artefacts) recovered from archaeological investigations are often deposited in local or national museums following archaeological analysis, and with the agreement of iwi. On other occasions iwi may prefer to retain ownership of artefacts and disputes can arise between different iwi with an interest in the area. Any disputes relating to the long term ownership and custody of taonga tūturu should be dealt with through the statutory processes of the Protected Objects Act 1975. The provisions of the Act require that all taonga tūturu are notified to the Ministry for Culture and Heritage within 28 days of the completion of archaeological fieldwork. Under s.11 and s.12 of the Act the Ministry for Culture and Heritage must notify all parties that have an interest in the taonga, and if competing claims for ownership are made and cannot be resolved the matter may be referred to the Māori Land Court for resolution.

11 August 2026

Environmental Protection Authority
Private Bag 63002
Wellington 6140
NEW ZEALAND

Teenaa koe

HUNUA QUARRY DEVELOPMENT - SUBSTANTIVE APPLICATION

1. These comments are provided on behalf of Te Whakakitenga o Waikato Incorporated (Waikato-Tainui).
2. Te Whakakitenga o Waikato Incorporated is the governing body for the 33 hapuu and 68 marae of Waikato and manages the tribal assets for the benefit of over 100,000 registered tribal members. It is also:
 - a) the trustee of the Waikato Raupatu Lands Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato Raupatu Lands Deed of Settlement 1995 and the Waikato Raupatu Claims Settlement Act 1995;
 - b) the trustee of the Waikato Raupatu River Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato-Tainui River Deed of Settlement 2009 and the Waikato Raupatu Claims (Waikato River) Settlement Act 2010 (River Settlement);
 - c) the mandated iwi organisation for Waikato-Tainui for the purposes of the Maaori Fisheries Act 2002; and
 - d) the iwi aquaculture organisation for Waikato-Tainui for the purposes of the Maaori Commercial Aquaculture Claims Settlement Act 2004.
3. Waikato-Tainui has outstanding and unresolved Treaty of Waitangi claims, including those specific to the Manukau Harbour. These claims form part of the broader Wai 30 claim, encompassing land, coastal and marine areas, and associated social, cultural, and economic interests. While settlement redress is not yet finalised, these claims underpin Waikato-Tainui's recognised interests and authority over West Coast coastal waters, harbours, waterways, and their connected catchments.
4. The proposed site is located within the Manukau Harbour catchment and therefore sits within an area in which Waikato-Tainui has longstanding interests and responsibilities. Waikato-Tainui's aspirations for the Manukau Harbour and its connected catchments,

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including the protection and restoration of the harbour's health and wellbeing, remain the subject of ongoing discussion and negotiation. These matters are relevant to the consideration of the Project and the management of its potential effects.

5. In this context, Waikato-Tainui considers it important that its interests, authority and aspirations in relation to the Manukau Harbour and its connected catchments are recognised in the consideration of the Project and reflected in any conditions of consent where appropriate.
6. Waikato-Tainui thanks the Panel for the opportunity to provide comment on the Hunua Quarry Development fast-track application.

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PROJECT OVERVIEW

7. Waikato-Tainui understands that the substantive application seeks the approvals required to authorise the Hunua Quarry Development, including resource consents and changes to existing consent conditions, a subdivision consent for a boundary adjustment, a Wildlife Act approval, an Archaeological Authority under the Heritage New Zealand Pouhere Taonga Act 2014, and a Complex Freshwater Fisheries approval under the Freshwater Fisheries Regulations 1983.
8. The application therefore provides for a broad suite of approvals associated with the development and continued operation of the quarry, with the full register of consents and approvals, supporting technical assessments and proposed conditions set out in the application documentation.

MANA WHENUA ENGAGEMENT

9. The Applicant has identified a range of cultural values raised by relevant mana whenua in relation to the Project, including the importance of waterways and mauri, ecological integrity and taonga species, mahinga kai and resource use, wetlands, cultural landscapes, archaeology, and the long-term rehabilitation of the quarry landscape.
10. Waikato-Tainui notes that Ngaati Tamaoho has emphasised the continuation of its established partnership with Winstone, including an ongoing role in kaitiakitanga and in the development, management and rehabilitation of the quarry. This includes involvement in management planning and implementation in relation to cultural landscapes, waterways, mahinga kai and resource use, wetlands and ecology, and archaeology and historic cultural narratives.
11. Te Aakitai Waiohū has identified concerns regarding the effects of the Project on cultural landscapes, waterways, wetlands, ecological systems and archaeological values. Te Aakitai Waiohū has sought ongoing involvement in the development and implementation of management plans, monitoring and cultural protection measures. Importantly, its CVA Addendum records its opposition in principle to the Project due to the significant adverse cultural effects it considers cannot be avoided or fully mitigated.

12. Ngaati Te Ata Waiohua has similarly identified principles of partnership, ancestral connection, ongoing presence, kaitiakitanga and environmental wellbeing. Its recommendations include protection of culturally significant sites, provision for tikanga, active involvement in design, protection of the mauri of Te Mangapuu, ongoing engagement and involvement in the development and implementation of management plans.
13. Waikato-Tainui acknowledges the applicant's assessment of these cultural values and the various measures proposed to respond to the matters raised by mana whenua, including the proposed management plans, cultural management measures, ongoing engagement, monitoring and establishment of a Kaitiaki Forum. We also acknowledge that engagement with mana whenua remains ongoing and that the applicant proposes to continue this engagement through the development and implementation of the Project. 0.002
14. Waikato-Tainui acknowledges the cultural values, concerns and recommendations raised by the mana whenua groups engaged in relation to the Project. Should the fast-track application be consented, we request that the applicant continue to engage meaningfully and directly with the relevant mana whenua throughout the life of the Project, including in relation to the finalisation, refinement and implementation of management plans, monitoring, cultural protection measures and the exercise of kaitiakitanga. 0.003
15. Waikato-Tainui's environmental baselines and expectations for the protection and management of te taiao are set out in the Waikato-Tainui Environmental Plan (Tai Tumu, Tai Pari, Tai Ao). The Plan provides the principal environmental policy framework for Waikato-Tainui and establishes objectives, policies and methods relevant to matters directly engaged by the Project, including freshwater, whenua, biodiversity, natural resources, cultural heritage, restoration and rehabilitation.
16. Given the nature and scale of the proposed quarry expansion and extraction activities, we expect the potential effects on these environmental values to be appropriately addressed through the consent conditions. Conditions should be consistent with, and where applicable give effect to, the relevant objectives, policies and methods of Tai Tumu, Tai Pari, Tai Ao, including in relation to the protection of waterways and ecological systems, management of land and natural resources, and the rehabilitation and restoration of affected areas. 0.004
0.005
17. Waikato-Tainui notes that mana whenua have raised a range of matters of importance in relation to the Project, including waterways and water quality, biodiversity and ecological integrity, cultural values, archaeology, and the long-term rehabilitation of the site. Waikato-Tainui supports the matters raised by mana whenua and expects these and other matters of importance to iwi to be appropriately recognised and addressed through the assessment, conditions and ongoing management of the Project.
18. Waikato-Tainui wishes to remain involved as the substantive application progresses, including in relation to matters relevant to our interests, the development and 0.006

refinement of proposed conditions and management measures, and any further information or technical work that informs the decision-making process.

Naaku i roto i ngaa mihi, naa

T Mapu

Te Maakariini Mapu
ENVIRONMENTAL PLANNER
WAIKATO-TAINUI

Your Comment on the Hunua Quarry project

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fastrack.govt.nz.

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)	Auckland Conservation Board		
First name	Gael		
Last name	Ogilvie		
Postal address	Auckland Conservation Board c/- Department of Conservation Private Bag 68908 Wellesley Street Auckland 1141		
Home phone / Mobile phone		Work phone	Board Support Officer Available Mon-Wed: [REDACTED]
Email (<i>a valid email address enables us to communicate efficiently with you</i>)	Aucklandconservationboard@doc.govt.nz		

2. We will email you draft conditions of consent for your comment			
☒	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

The Auckland Conservation Board (ACB) Commentary on the Fast-Track Proposal for Hunua Quarry Expansion (FTAA—2603-1185)

Introduction:

Te Rūnanga Papa Atawhai o Tāmaki Makaurau/The Auckland Conservation Board (The Board) is an independent statutory body appointed by the Minister of Conservation under the Conservation Act 1987. The purposes and functions of conservation boards are set out in sections 6M and 6N of the Conservation Act.

The Board operates in accordance with Section 4 of the Conservation Act to uphold te Tiriti o Waitangi obligations and give effect to the Treaty's principles. This requires fostering conservation partnerships with tangata whenua (Māori) at a local level, recognizing and supporting their aspirations for cultural and environmental stewardship, and incorporating Māori values and knowledge into conservation decisions and management.

Under the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014, three members of the Board are appointed by the Minister of Conservation on the recommendation of the Ngāti Whātua rūpū, Marutūāhu rūpū and the Waiohua Tāmaki rūpū. Board members have individual expertise in ecology, biodiversity, statutory process, cultural redress, policy, communications, and bring this to board work.

The proposed expansion of the Hunua Quarry is a listed project under Schedule 2 of the Fast-Track Approval Act (FTAA 2603-1185). Under Section 53 (2)(m) of this Act, the Board is identified as a party to consult with, if Wildlife Act 1953 permits are required. Under Section 4 of the Act, approvals are also required for complex fisheries activities including culverting disturbance and diversion.

The Board comments are therefore focused on the proposed project's terrestrial and freshwater ecological impacts and associated impact mitigation, offsets and management plans.

Project Description

The Hunua Quarry Expansion involves expanding and deepening of the existing Symonds Hill Pit to access high-quality greywacke and extend the quarry's operational life by approximately 50 years. This is intended to help with the ongoing and reliable supply of aggregates required to meet Auckland's infrastructure needs.

The proposed works are located within the Winstone Aggregates landholding. To enable access to this greywacke a tributary of Mangapū Stream (Symonds Stream) will be diverted.

The stream is bordered by private properties towards the south and quarry to the north and drains west towards Slippery Creek.

Board review process

The Board feedback is based on review of the following documents:

1. Fast Track Approvals: Wildlife Approvals report - DOC 51 report (July 2026)
2. Complex Fisheries Report DOC July 2026
3. Ecological Assessment Appendix B12.4.5 of Assessment of Environmental Effects June 2026
4. Lizard Management Plan (LMP) Appendix B12.8.4 of Assessment of Environmental Effects June 2026
5. Ecological Management Plan Appendix B12.8.10 of Assessment of Environmental Effects June 2026
6. Stream Realignment Plan Appendix B12.8.7 of Assessment of Environmental Effects June 2026

The ecological sections of the project overview conference video, which occurred on the 8th July 2026 were also viewed.

Board Feedback

The following provides the Board's feedback on the ecological impact mitigation measures proposed by Winstones, and outlined in the documentation reviewed.

Terrestrial Conservation

The key terrestrial conservation impacts arising from the proposed project are loss of indigenous forest habitat and resulting impacts on native fauna within and adjacent to the quarry footprint, including indigenous lizard species.

The proposed Hunua Quarry expansion is located within and adjacent to areas identified as Significant Ecological Areas (SEAs) under the Auckland Unitary Plan, including SEA_T_5323 and SEA_T_7032. These SEAs form part of a wider network of indigenous forest remnants and ecological linkages on the western margins of the Hunua Ranges, within the Manukau Ecological District. The area contains some of the most extensive remaining indigenous vegetation in the Manukau Ecological District, which is otherwise dominated by pastoral land use. Predominant ecosystem types are :

- Kānuka forest

- Tawa-taraire forest with mature kānuka
- Kānuka/Manuka scrub

The ecological significance of the area arises from its contribution to the fragmented indigenous forest landscape of south-east Auckland, providing habitat for native fauna and supporting ecological processes across the foothills of the Hunua Ranges. The area includes indigenous vegetation communities typical of the region's lowland forest ecosystems, as well as associated streams and riparian environments.

Over the life of the project approximately 44.4 ha of the indigenous forest habitat within and adjacent to the existing SEAs and nine small inland wetlands will be lost.

To mitigate this loss, the applicant is proposing substantive restoration initiatives to create a “*well connected and valuable biodiversity hubs*”¹.

More specifically the applicant is proposing to:

- Plant 85 ha of new indigenous forest alongside existing mature forest
- Implement progressive rehabilitation of the site
- Implement pest animal and weed control programmes within the overall site
- Enhance wetlands within the Hunua quarry and at the Winstone MereMere quarry in Waikato
- Provide additional fencing and stock protection in the vicinity.

The site supports a range of:

- indigenous birds, including Kereru, Tui, Piwakawaka, Tauhou (silvereye) Riroriro (Grey Warbler),
- gecko and skink species recorded as present or likely to be present (based on habitat) including elegant geckos (*Naultinus elegans*), copper skinks, ornate skinks, forest geckos and Pacific geckos.

Elegant geckos, which have a conservation status of At Risk - Declining, were previously abundant in the area inhabiting mature kānuka . vegetation. Between 2011 and 2015 , 152 Elegant geckos were collected and relocated, initially within the site and subsequently to Tiri Tiri Matangi. Only three elegant geckos have been found since 2020.

To mitigate loss of wildlife, Winstone are seeking authorisation for activities including the capture, handling and relocation of protected wildlife and, where impacts cannot be completely avoided, authority for incidental mortality associated with quarry development.

Where possible, Winstone's are proposing to salvage and relocate gecko and skink species, as described in their Lizard Management Plan (LMP)² and the DOC Wildlife Approvals Report³

¹ Appendix B12.4.5a Assessment of Environmental Effects

² Lizard Management Plan Appendix B12.8.4 of Assessment of Environmental Effects June 2026

³ Fast Track Approvals: Wildlife Approvals report - DOC 51 report (July 2026)

The LMP provides for best practice lizard salvage methods for elegant geckos (*Naultinus elegans*). The salvage work will only be:

- undertaken Oct to mid-April when Lizards active
- carried out by a named project ecologist or herpetologist

Post-release monitoring will be carried out at the release sites.

The LMP provides detailed methods for pre-salvage surveys and ongoing detection efforts during the indigenous vegetation removal. Given the recent substantive reduction in population numbers of elegant geckos in the area, it is likely that very few will be found and relocated.

The ACB commends Winstone's for their commitment to implement substantive ecological restoration and improvement initiatives as part of the quarry expansion project. The documents reviewed to prepare this submission all reflect a strong motivation to go beyond offsetting adverse impacts, to restoring and enhancing the natural environment. It will, however, be critically important that the significant suite of proposed initiatives to counter environmental impacts are effectively implemented. To ensure this occurs, ACB recommends that the project approvals include specific conditions for Winstones to

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- monitor and report on all terrestrial ecological enhancement initiatives described in the project resource consenting documents for the duration of the project.
- implement additional agreed ecological enhancement where predicted net impacts are less positive than expected,

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It will also be critical that the effectiveness of relocating any salvaged lizards is carefully monitored. Over recent years there has been a significant increase in commitments to offset ecological damage through initiatives such as ecological restoration in a different location and relocating native species to new homes. The little information currently available strongly suggests that such lizard relocations have a very low probability of success (~20%). As such, there is a significant long term ecological risk from approving projects on the strength of offsetting commitments. In most cases the ecological impacts, in particular habitat loss, are immediate and can be accurately predicted, whereas the success of offsetting initiatives are unknown, and occur over the long term.

0.004

Freshwater Conservation

A total of approximately 1,157 metres of existing intermittent and permanent stream in the vicinity of the proposed quarry expansion will be permanently lost.

To offset this impact, Winstones are proposing to:

- realign the existing Mangapū Stream Channel

- enhance 1000 meters of current pasture watercourses in the Meremere Quarry Stream in the Waikato and the Waipokapū stream along the northern boundary of the Hunua quarry site
- remove willows along 2,580 m of the Mangatawhiri stream
- improve aquatic habitat conditions in the headwaters of the Waipokapū and Meremere Quarry Streams

Based on aquatic ecological surveys and eDNA sampling, the species inhabiting the Mangapū stream include short and long finned eels, banded kokopu, koura (freshwater crayfish,) and numerous other invertebrate species including snails, limpets and mayflies. The stream has been rated as having a natural character of high to very high⁴

The stream realignment is proposed to occur in short successive increments as a way of testing the success of different habitat reconstruction efforts and modifying methods as required. The new U-shaped stream channel will be approximately 1 metre wide and will be formed using a bulldozer and excavators. It will be lined with low permeability material and be sufficiently sized to capture the 1 in 100-year rainfall event. Boulders will be placed within the new channel to create a more diverse habitat.

Both the section 51(2)(e) complex freshwater fisheries activity approval report and the Freshwater Technical Advice Report indicate that there are unresolved issues regarding the status of shortjaw kōkopu on the site. DOC (and their technical advice) consider that a survey for shortjaw kokopu must be concluded prior to initiating any works. This must be addressed in the relevant management plans.

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Despite the proposed careful sequential approach to creating the new realigned stream environment, it is unlikely that the proposed new sections of streams will closely replicate the existing complex natural environment that has evolved over millenia. Similarly, the proposed enhancement in other locations, particularly for streams draining pastoral catchments will not be sustainable unless the catchment land uses are also recreated. As with the proposed terrestrial offsetting, ACB recommends that the project approvals include specific conditions for Winstones to:

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- monitor and report on all freshwater ecological enhancement initiatives described in the project resource consenting documents.
- implement additional agreed ecological enhancement where predicted net impacts are less positive than expected,

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Summary

There are a total of five management plans that describe multiple ecological offset commitments to be implemented as part of the Winstones quarry expansion project. These are:

⁴ Stream Realignment Manage Plan, Appendix B12.8.7 of the Assessment of Environmental Effects June 2026

1. Aquatic Fauna Salvage and Relocation Plan
2. Lizard Management Plan
3. Pest Management Plan
4. Stream Realignment Management Plan
5. Ecological Management Plan

The ACB commends Winstone's for their commitment to all of the proposed ecological impact mitigation and enhancement measures intended to offset the predicted adverse terrestrial and freshwater ecological impacts arising from the proposed quarry expansion. We have concerns, however, regarding the extent to which the offsets will be effective. If the project proceeds as described, the predicted impacts, in particular loss of high value indigenous terrestrial and aquatic habitats, will certainly occur. The replacement habitats created as an offset to this definite loss are significantly less certain to be close or even near to the quality of the lost habitat.

As outlined in the above management plans, Winstones appear to have adopted a strategy of over-offsetting, as an antidote to the uncertainty surrounding the effectiveness of the proposed methods. This is also commendable. Given the need for aggregate supplies as Auckland develops, the ACB are not opposing this project with all its associated ecological impact mitigation and offsetting. We are, however, requesting, a best practice adaptive management approach is adopted, to closely monitor the effectiveness of the proposed offsets and inform revised improved actions if required.

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Recommendations

The Auckland Conservation Board recommends that project approvals include specific conditions for Winstones to take an adaptive management approach to the proposed offset provisions for mitigating predicted adverse impacts. More specifically, conditions that require Winstones, for the duration of the project, to:

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- monitor and publically report on the results of all terrestrial ecological and freshwater enhancement initiatives, including the effectiveness of lizard relocations, as described in the project resource consenting documents
- implement additional agreed ecological enhancement where predicted net impacts are less positive than expected,

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Thank you for the opportunity to input.