



3 August 2026

Environmental Protection Agency
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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 Waiohūa is also a Mana Whenua member on the Pukekōwhiri Paa 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 Waiohūa 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 Waiohūa 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.

Te Ākitai Waiohūa agree the intention to progress a fast-track application was introduced at the Kaitiaki forum in 2025, of which Te Ākitai Waiohūa 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 Waiohūa 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 Waiohūa 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 Waiohūa is invited to make comments through TAWST as an iwi authority on multiple applications under the FTAA, affecting the iwi's limited capacity.

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

The Te Ākitai Waiohūa 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 Waiohūa 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.

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.

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.

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.

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.

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



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.

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.

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.

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.

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.

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.

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.



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 kānuka, 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.

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.

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.

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.

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.

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

4.5 Rehabilitation

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

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.

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.

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.

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.

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.

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.

Ngā mihi,

Te Ākitai Waiohū Settlement Trust

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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		
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Postal address	[REDACTED]		
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Email (a valid email address enables us to communicate efficiently with you)	[REDACTED]		

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.