

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.

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

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.

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.

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.

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.

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.

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.

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.

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

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.*

- *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.

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.

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.*'

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.

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.

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.

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.

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.

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.

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.

8.0 Proposed Conditions

N/A