

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.
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.

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.

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.

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.

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

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.

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.

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.

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.

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

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.

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.

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.
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.
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.

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.
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.
 - 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.
 - 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.

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.

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.

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.

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.

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.

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:

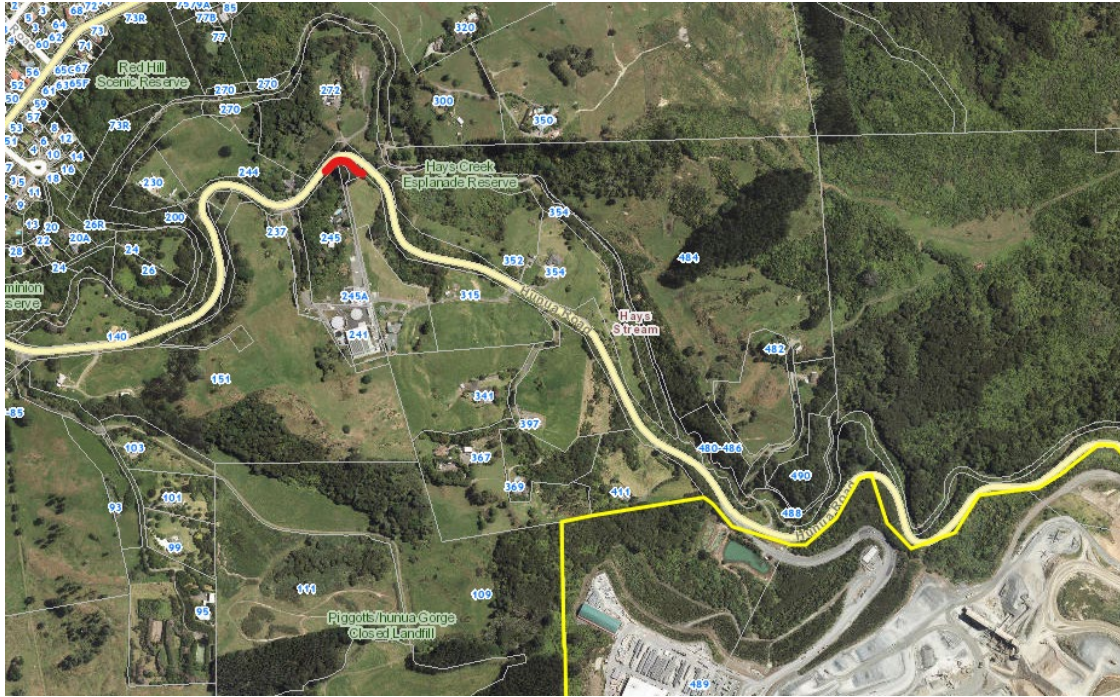


Figure 1: Aerial image showing subject site (outlined in yellow) and area of concern raised by Auckland Transport (red).

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

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.
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.
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.
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.

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.
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.
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.

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

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.
 - 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.
 - 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.
 - 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.
 - 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.

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.

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.

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.

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.
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.
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.

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.
120. Provided the recommended conditions are imposed, there are no significant residual landscape and visual impacts that require proportionality assessment.

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.
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.

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.
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.

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.
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.

Conclusions on Archaeology effects

132. Adverse archaeology effects are not anticipated by the proposed development.
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.
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 Waiohua in relation to the additional landscape assessment from Pukekoiwiriki pa.
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.
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.
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.

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.

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.

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.

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.

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.

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.
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.

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.

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.

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.
- **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.
- **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.

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.
 - 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
 - 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.
 - 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.
 - 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.
- b. Mr Yeoman in his review concludes 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.”*
 - 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.

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

	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.

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.
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.

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.
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.
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.
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

	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;
- 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;
- 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.
	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"

	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.
Part A	Add abbreviation to this table as follows: - CMP – Cultural Management Plan
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>
Condition 25	Add reference to Cultural Management Plan into Table 1
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.
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)
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>

	(i) <i>for at least five (5) years, or and until 80% canopy closure is achieved (whichever occurs first); and</i> (ii) <i>until a plant survival rate of at least 90% of the original planting density has been achieved;</i> ...
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) <i>as far as practicable, ...</i> b) <u>achieves no net loss of value; and</u> c) <i>...</i> 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>

	(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>
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.
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.
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.
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>

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>
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.
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</u> long-term health and sustainability is ensured without the requirement for intensive management, <u>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.
Condition 131 and 132	Suggest that these conditions form part of condition 130 as it is intrinsically related to the understanding of condition 130.
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

	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>
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>
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>
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>
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.
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>
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>

	(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
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.
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.
Conditions 211-214	Conditions refer to Symonds Stream when it should be Mangapu stream for consistency across conditions.
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>
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>
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>
	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.							
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> ...							
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.							

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.
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):
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

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.

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.

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.

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.

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.

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.

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.

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.
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.
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.
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.
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;

- 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;
- 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.

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.

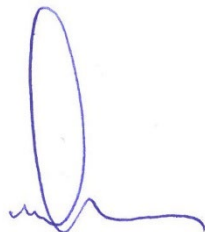
DATED the 11th day of August 2026



Planner

Emma Chandler

Planning Consultant for Auckland Council



Reviewer

Warwick Pascoe

Principal Project Lead, Auckland Council