

BEFORE THE FAST-TRACK PANEL

IN THE MATTER

An application for approvals under section 42 of the Fast-track Approvals Act 2024 (“Act” or “FTAA”)

AND

IN THE MATTER

Kings Quarry, a project listed in Schedule 2 to the FTAA

MEMORANDUM OF COUNSEL

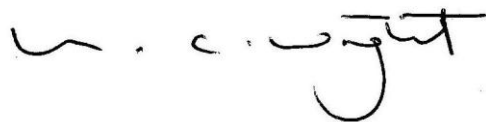
21 October 2025

MAY IT PLEASE THE PANEL

1. Kate Jones and Charles Wedd [REDACTED]
[REDACTED] have been invited to comment on the Kings Quarry substantive application in accordance with Minute 6.
2. Comments are due midnight 28 October 2025.
3. On 15 October 2025 the Panel issued Minute 8 requesting the applicant provide further information. The information requested is essentially:
 - a. filling information gaps in the application materials as lodged; or
 - b. providing further detail necessary to support or explain conclusions in the substantive application materials as lodged.
4. Consequently, Ms Jones and Mr Wedd are concerned that the comments they provide on 28 October 2025 will be based on an incomplete picture of the substantive application and so will not address all matters of concern to them. For example:
 - a. A visual simulation is requested for RVP-3. This viewpoint looks directly over Ms Jones and Mr Wedd's property [REDACTED]
[REDACTED]. Their comments would have addressed the impact revealed by and/or the accuracy of this simulation if it had been included in the substantive application as lodged.
 - b. The Quarry Buffer Area Overlay does not extend across [REDACTED]. This is a result of Ms Jones' and Mr Wedd's submission and evidence on the Auckland Unitary Plan. Their comments would have responded to any explanation about its shape and extent if included in the substantive application as lodged.
 - c. Ms Jones and Mr Wedd have engaged an independent economist to review and prepare a report on the application to inform their comments. The information provided in response to the matters at paras 7-9 of Minute 8 would materially influence that assessment.
 - d. Ms Jones and Mr Wedd have engaged an independent noise expert to review and prepare a report on the application to inform their comments. The information provided in response to the matters at para 12-17 of Minute 8 would materially influence that assessment.
 - e. Ms Jones and Mr Wedd intend to comment on the dust management plan and proposed mitigations, adverse groundwater impacts, and the Greenhouse Gas Emission Assessment. The information provided by the applicant in response to the Panel's questions on these matters would materially influence those comments, because it goes to nature and extent of adverse impacts and proposed conditions, and the extent of alleged benefits.
5. As a result, Ms Jones and Mr Wedd respectfully request that that the Panel considers exercising its discretion under s 67 of the Act to request that they provide further information commenting on the information provided by the applicant on 30 October

2025 and 6 November 2025. They understand this would need to be limited to new information and not repeat comments provided on 28 October 2025.

6. Counsel thanks the Panel for attending to this matter.

A handwritten signature in black ink, appearing to read 'M. C. Wright'.

Madeleine C Wright

Counsel for K Jones & C Wedd